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ABSTRACT

This document contains the distance learning evaluator training program of the Distance Education and Training Council (DETC), which is intended for the following audiences: institutions considering or actually undergoing reaccreditation; new accrediting commission evaluators; and trained evaluators. The following are among the topics covered in the course's eight sessions: DETC Accrediting Commission (history, founding principles, philosophy, functions, handbook, selection of members); accreditation process (standards, steps, flowchart); service as an accrediting commission evaluator (qualities, benefits, prerequisites, duties, ethics, conflicts of interest); self-evaluation report (purposes, development, tips for use, contents); educational standards evaluator (tasks, role, questions, tips); business standards evaluator (tasks, key focus points); committee chair (responsibilities, duties of the chair before the site visit, orientation executive breakfast meeting, orientation to the school, working luncheon meeting, conclusion of the site visit, purpose and contents of the chair's report, school's response to the chair's report) and report writing (structure of the examiner's rating form, importance of documenting all "no" answers, tips on writing to the report's audiences, guidelines for additional comments, compilation, other commission forms). Concluding the document is a section containing information about the final examination, the actual final examination, and an answer sheet. (MN)

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DETC
Evaluator Training Program

A Distance Education Course to Train Evaluators for DETC Accreditation Visits

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DETC
Evaluator Training Program

A Distance Education Course to Train Evaluators for DETC Accreditation Visits

DETC Evaluator Training Program

A Distance Education Course to Train Evaluators for DETC Accreditation Visits

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Edited by Sally R. Welch

The independent Accrediting Commission of the Distance Education and Training Council is listed by the U.S. Department of Education as a "nationally recognized accrediting agency." The Accrediting Commission is also a recognized member of the Council for Higher Education (CHEA). The U.S. Department of Education and CHEA recognition is for postsecondary purposes only.

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Introduction

Welcome to the Evaluator Training Program!

On behalf of the Accrediting Commission of the Distance Education and Training Council, please accept our warmest welcome to the Commission's distance learning evaluator training program.

Serving as a volunteer examiner for the Commission is a serious undertaking, one that can have a career-enhancing impact on you and a profound impact on the institutions you may be appointed to visit and evaluate. ***(Please note, we use the terms "evaluator" and "examiner" interchangeably throughout this course.)***

Volunteers like you are the "eyes and ears" of the Commission.

We are delighted you have chosen to study this specially written distance learning program because it demonstrates your support of the DETC accrediting program. Since 1955, when the leaders in the distance learning community first accepted the challenge of peer reviews of its member institutions, volunteers such as you have helped to improve the quality of distance learning.

This distance learning program has been developed to help both the Accrediting Commission and you. It is intended to be a dynamic learning program that will be updated frequently as the Commission's standards, practices, and policies change. This program is distance learning at a practical, "how to" level. You learn when and where you choose.

We wish you every success with this program. Do not hesitate to call to discuss any aspect of the course with the Commission staff in Washington. And, if you spot an error in the text, please let us know!

Your Learning Goals in Completing this Program

This program is designed to help you achieve the following goals:

- To train you as an Accrediting Commission evaluator who:
  - > prepares thoroughly for the on-site visit;
  - > evaluates all material in a consistent way;
  - > covers all assigned areas;
  - > judges objectively;
  - > treats confidential information with sensitivity;
  - > prepares accurate and reliable written reports; and
  - > observes Accrediting Commission policies and procedures for on-site visits;
- To give you a thorough understanding of the DETC accrediting program and how it can improve institutions; and
- To help you, as a writer, prepare an analytical and insightful Self-Evaluation Report (SER).

Who Should Take This Course?

This DETC Evaluator Training Program is written for the following audiences:

- **Institutions considering applying for initial accreditation.** There have been occasions when an institution has applied for accreditation before it fully considered all that was involved in the process. Since this course thoroughly covers the entire process of accreditation, anyone completing the course should find no surprises if the institution decides to apply. An institution which is considering applying for accreditation should honestly consider how they would answers the questions in the Self-Evaluation Report. It should evaluate whether it meets the published standards. The institution should pay particular attention to the questions the subject specialists will address when evaluating the individual courses. An institution should not take this process lightly, and it should fully consider the time and expenses involved before applying.

Don't forget, applying for accreditation is a serious matter!

- **Institutions applying for initial accreditation.** An institution applying for accreditation and undergoing an on-site visit for the first time will find this course very helpful because it lists detailed information about how examiners prepare before a visit, what will happen on the day of the visit, and what will happen after the visit. The Commission requires that at least one senior official of an initial applicant

institution successfully complete this program prior to the date of the on-site visit.

- **Institutions undergoing re-accreditation.** An institution that is preparing for its five year review can use this course as a refresher on the accreditation process. The section on the Self-Evaluation Report (SER) is especially helpful to those people who will be involved in writing the SER.

- **New evaluators.** Before this course was developed, the only way DETC members wishing to become evaluators could be trained was to attend a one-day training seminar. A Training Seminar for Accrediting Commission Evaluators is held only once each year at various locations. Now, you can get the same training by completing this course. Individuals from distance learning institutions that **are not** DETC members **are not** eligible to be selected as evaluators.

- **Trained evaluators.** Let's say that you attended and completed an Accrediting Commission Training Seminar in 1985. Now, it's 1997, and this is the first time the Commission staff has asked you to serve as an evaluator. By completing this course you can quickly be brought up to speed on all the latest procedures. By doing so, you'll feel confident and fully prepared when you show up for your first visit! And, even if you're a veteran of several on-site visits, studying this course will give you a few pointers!

Becoming a Qualified Evaluator

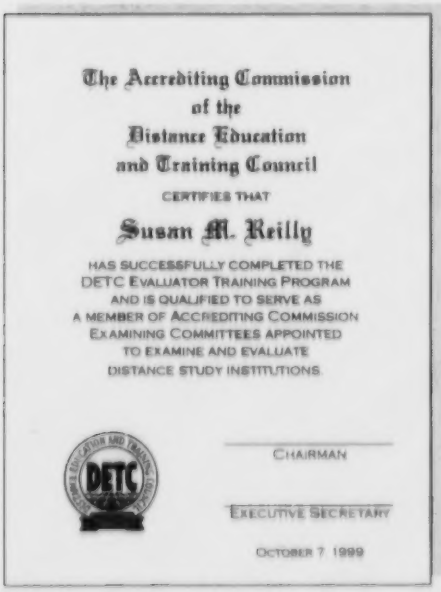
To become a **qualified evaluator** you must successfully complete this program, including the final exam, and serve as an Examiner-in-Training on at least one on-site visit.

When you complete this course and before you go on your first on-site visit, the Commission staff will need information to prepare your biographical sketch for use with the Examination Schedule.

Please complete and return to the Commission the form entitled "DETC Professional Qualifications of Accrediting Commission Examiner" found in the side pocket of this binder.

Certificate of Completion

When you have successfully completed this distance learning course, which means you read it, completed the final exam, sent the exam in for grading, and received a passing grade of at least 70%, you will receive a "Certificate of Completion" from the Accrediting Commission. Your name will be added to the list of distinguished evaluators, and if you are eligible, you will be considered for possible selection to serve on an examining committee. Normally, you will be asked to serve as an Examiner-in-Training on your first on-site visit.



The Accrediting Commission
of the
Distance Education
and Training Council

CERTIFIES THAT

Susan M. Reilly

HAS SUCCESSFULLY COMPLETED THE
DETC EVALUATOR TRAINING PROGRAM
AND IS QUALIFIED TO SERVE AS
A MEMBER OF ACCREDITING COMMISSION
EXAMINING COMMITTEES APPOINTED
TO EXAMINE AND EVALUATE
DISTANCE STUDY INSTITUTIONS

DETC

CHAIRMAN

EXECUTIVE SECRETARY

OCTOBER 7 1999

When you complete this course you will receive this striking certificate, suitable for framing!

One Final Note

One final note before you get started. You will probably notice when reading this course that there is some repetition of certain material. This is a classic distance learning technique and it is consciously used to reinforce key points.

About the Authors

Nancy S. Donley

Ms. Nancy S. Donley is the Executive Director of the National Center for Workforce Development and Evaluation. As its Director, she has coordinated staff research in projects undertaken by the Center, developed and presented training materials, and overseen course development. In addition, she is skilled in legislative and regulatory terms and procedures and is experienced in planning and conducting meetings for more than 500 people.

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Dr. Rokicki served on the DETC staff in Washington. He was also responsible for the development and implementation of a multi-site computer system that annually tracked over 26,000 individuals who received more than $100 million in funds. He has developed numerous courses for private business and has written collegiate courses. As the company's President, Dr. Rokicki represents the company to local, state, and national groups and organizations. He is a well-known speaker and presenter, and addresses groups on issues as diverse as welfare reform, school-to-career, the legislative and regulator processes, and the global marketplace. He also serves as the Executive Director of the Florida Institute for Career and Employment Training of Florida Atlantic University in Fort Lauderdale, Florida.

Session One

The DETC Accrediting Commission

In this first session, you will be given a brief overview of the history of the Accrediting Commission, including some of the founding principles and philosophy that went into the formation of the accrediting program. You will learn what accreditation means, not only to the public but also to DETC institutions. You will also learn how standards and policies are created.

History of the Accrediting Commission

The Distance Education and Training Council was founded as the National Home Study Council in 1926. It was organized as a voluntary association of correspondence or distance education institutions to promote "sound educational standards and ethical business practices within the distance education field." In 1952, the Council decided further improvements should be made in the procedures used to examine and approve distance education institutions. With the help from the then-U.S. Office of Education, the National Commission on Accrediting, and other established accrediting bodies, an independent Accrediting Commission was established in 1955. Shortly thereafter the Accrediting Commission gained federal recognition from the U.S. Office of Education as the "nationally recognized accrediting agency" for correspondence schools.

Like other accrediting agencies, the Accrediting Commission is reviewed periodically by the U.S. Department of Education to make certain that it meets the criteria for federal recognition as published in Title 34 of the Code of Federal Regulations. Since 1959, the Accrediting Commission has been continuously recognized by the U.S. Secretary of Education, and its recognition was last renewed in 1996.

The Accrediting Commission has four public members from outside the distance learning field who are selected for their overall interest in education and their competence in business, industry, education, government, and related fields. The Commission also has three school representatives who are senior executives of accredited distance education institutions. The Accrediting Commission is the **only** nationally recognized institutional accrediting agency that has a majority of public members.

The Accrediting Commission is also recognized for its academic degree work by the Council for Higher Education Accreditation (CHEA). CHEA is a non-governmental body that recognizes and coordinates the activities of higher education accrediting agencies throughout the United States. CHEA recognition applies only to the Commission's academic degree activities.

Today, the Commission is nationally and internationally recognized as the accrediting body for both private and non-private distance education institutions. It accredits at **all levels** of instruction, from pre-school, elementary, and secondary to postsecondary. The Commission accredits both non-degree and academic degree programs from the associate's through the master's degree levels.

Accreditation is a peer-review process.

Founding Principles and Philosophy

For well over four decades the Commission has attempted to conduct a high quality, fair, and reputable accrediting program. Basic tenets of the accrediting program are:

- Accreditation is based on a review of the **institution** and covers **all** distance study courses offered by that institution. This makes the Accrediting Commission unique because it reviews **each program or course** as well as the **entire institution.**

- Accreditation is **non-governmental**.

- Accreditation is **voluntary.** There is no legal requirement to seek or keep accreditation.

- Accreditation is firmly rooted in the principles of **peer review**. Practicing experts in distance education are chosen to evaluate applicant institutions.

- Accreditation is **outcomes focused**, where the emphasis is on determining how well an institution demonstrates that it delivers on its promises to students and to the public.

- Accreditation is **consumer oriented** because the interests of the public are considered paramount in all Commission decisions.

- Accreditation is **collegial**. It is intended to be a positive, constructive, non-legalistic approach for all participants.

These are the fundamental building blocks of DETC accreditation. It is a process intended to:

- identify, for public purposes, **quality distance learning institutions;**
- promote institutional **self-analysis** and **self-improvement;** and
- provide a rationale for **continuous, formal organizational renewal** for distance learning institutions that aspire to maintain the highest academic standards.

DETC accreditation is **not** primarily a means to qualify for various tuition funding programs. It is **not a guarantee** that a graduate's credit will be accepted at another academic institution. Likewise, it is **not a license** to hide behind in order to take advantage of students.

It is through the voluntary support of the Accrediting Commission that the distance learning field, as represented by the DETC since 1926, continues to earn a place of respect in national and international education and training circles.

What is Accreditation?

Simply stated, distance learning accreditation is a certification process by a recognized body that an institution has **voluntarily** undergone a comprehensive study and examination. During this study and evaluation, the school must demonstrate that it performs the functions it claims, such as:

- setting educational goals for the students who enroll; and
- furnishing materials and services enabling students to meet the stated educational goals.

Most experts agree that accreditation is:

> *". . . a process whereby an association or agency grants public recognition to an institution or program as having met certain established qualifications or standards as*

determined through initial and periodic evaluations. Accreditation also implies stimulation toward improvement beyond the minimum standards specified by the accrediting body."

Historically, and currently, accreditation may be said to:

- foster excellence in education through the development of standards for assessing educational effectiveness;
- encourage improvement through continuous self-evaluation and planning;
- demonstrate comparability between degree programs offered at regionally accredited institutions with DETC-accredited degree programs; and

Accreditation is not a "one time" award. An institution must earn it every day to keep it.

- assure the educational community, the general public, and other agencies or organizations that an institution has both clearly defined and appropriate objectives; maintains conditions under which their achievement can be reasonably expected; is in fact accomplishing them; and can be expected to continue to do so in the future.

Accreditation is evaluation by your peers. It is a "seal of approval" that a prospective student looks for when he or she is trying to decide in which institution to enroll. Students should feel confident they will get the best education and training available when they enroll with a DETC-accredited institution.

Application for accreditation from the DETC Accrediting Commission may be made at any time by any private or non-private **bona fide** correspondence or distance education institution with two continuous years of sound and ethical operating experience. The institution must not offer doctoral programs, because the DETC Accrediting Commission is recognized by the U.S. Secretary of Education to accredit only through a master's degree level.

The Value of Accreditation

For the educational institution, accreditation by the Accrediting Commission of the Distance Education and Training Council means that:

- the institution has voluntarily asked to be evaluated. There is no federal requirement that a school has to be accredited to operate. Accreditation is best served when a school desires to prove the worth of its educational programs and services.

The Commission must balance the desires of the institutions to enroll students with the needs of the public for quality educational products.

- the institution has undergone the rigors of the self-evaluation process, undergone an intensive peer review, and submitted all the necessary information to the Accrediting Commission.

- during a peer review, a group of outside experts has reviewed the institution's curricula, finances, and student outcomes and found them to meet or exceed the minimum standards established by the Commission.

- the institution is set apart from the other institutions because it is accredited by its peers. The institution has earned the right to call itself an "accredited institution."

The value of accreditation is determined by the willingness of the Commission and evaluators, such as yourself, to evaluate an institution against the published standards. The importance of accreditation is directly proportional to the willingness of the institution to maintain the standards voluntarily and the Commission's vigilance in enforcing the standards.

The Benefits of Accreditation

Here are just a few benefits of accreditation. For a more detailed list, read pages 11 and 12 in the *DETC Accreditation Handbook.*

Voluntary accreditation:

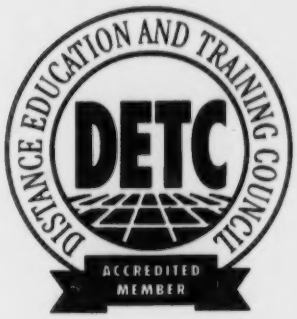
- provides a reliable indicator of academic quality for counselors, employers, educators, governmental officials, and the public;

- is an expression of confidence in the educational programs, the policies, and the procedures of an institution by its peers—a lasting source of pride;

- is an external source of stimulation to improve services,

programs' and staff through periodic self-studies and evaluations by an outside peer group;

- is an assurance of the maintenance of high standards through the institution's adherence to nationally recognized criteria, policies, and standards;
- qualifies a distance learning institution to participate in selected federal tuition assistance programs and certain corporate tuition reimbursement programs; and
- allows the use of the DETC seal and reference to accreditation by the Accrediting Commission of the Distance Education and Training Council.



Look for the DETC "seal of approval" when you want to know if an institution is accredited.

The Functions of the Accrediting Commission

Why do we have an Accrediting Commission? If you read the introduction to the *DETC Accreditation Handbook,* you will see that some of the key functions of the Accrediting Commission are to:

- establish and enforce standards for the evaluation and accreditation of distance learning organizations;
- appoint qualified evaluators and provide for a comprehensive evaluation procedure;

- review the Chair's reports and all other pertinent material and accredit or withhold accreditation from applicant institutions;
- make available to the public current information covering the standards for accreditation and the operation of the Commission; and
- exercise such other powers as are necessary to carry out the function of a reputable, nationally recognized accrediting association.

There are other accrediting commissions recognized by the U.S. Department of Education to accredit national, regional, or specialized institutions or programs. But, the DETC Accrediting Commission is the **only** recognized grantor of institutional accreditation for distance learning on a national and international basis.

The Commission publishes standards against which all institutions, current and potential, are measured. Meeting at least twice each year, the Commission makes all decisions regarding the award of accreditation. Its seven-member board, four from the public sector and three from the institutional sector, elect its own Chair and Vice Chair and selects the Executive Secretary, who is responsible for the day-to-day operations of the Commission.

Where Do the Policies and Standards Come From?

Since the Accrediting Commission's founding in 1955, the process of writing, clarifying' and changing standards to meet the needs of the public and distance education students has continued. Input for the standards and policies of the Commission come from the following sources:

- **The Commission members themselves.** The Commission

uses feedback from evaluators, such as yourself, and input from the staff which monitors it policies and standards.

- **Currently accredited institutions.** Based on a problem or opportunity pointed out by the an accredited institution, the Commission considers changes to its policies. For example, when computers were introduced and considered for use by an institution and/or added to a course, some Commission policies needed to be modified and new policies written to acknowledge and measure the use of this technology in an institution's recordkeeping and as an educational "tool" in a course.

- **Federal and state regulators.** As problems are brought to the Commission's attention by regulators, the standards are sometimes changed to reflect the realities of what is happening in the field. For example, when a state adopts a law that affects a distance education institution, the Commission can examine the law and consider any appropriate changes to its own standards.

- **Students and the general public.** The Commission changes its policies to reflect comments from students and the public. If the wording of a standard allows a questionable practice to exist, then the standard may have to be modified to eliminate that practice.

The Commission uses several different surveys to collect data which are used to modify standards and policies. Suggestions are always welcomed!

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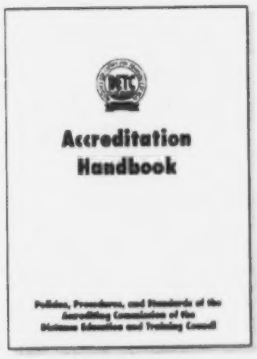
- **Reliability surveys.** Once every three years the Accrediting Commission surveys various consumer groups, employers, state and federal agencies, member and non-member institutions, other accrediting agencies, and colleges and universities to ask for their opinions on how **reliable and valid** the standards are. Comments received from the surveys are given to the DETC Research and Educational Standards Committee to consider possible changes.

- **The evaluators.** After an examining committee visits an institution, the evaluators are asked to complete a questionnaire concerning the school visit, the Self-Evaluation Report, interpretation of the standards and policies, and the accreditation process. The responses are studied by the Commissioners and possible changes are considered.

The policies and standards of the Commission are changed and modified **constantly.** You, as an evaluator, have an opportunity and an obligation to recommend changes to a standard or policy if you believe that a change is needed. The Commission listens to you and encourages your constructive comments.

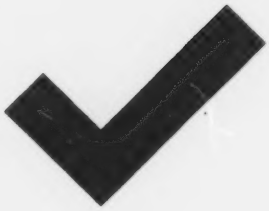
Handbook Reading Assignment



As part of this course you will be asked to read materials relevant to the course. For your first reading assignment, take your *DETC Accreditation Handbook* (the green three-ring binder) and read under the first section, "Preface," "Introduction," "Accreditation," and "The Accrediting Commission." (Consult the "Contents" for the appropriate page numbers.) This reading selection provides additional background on accreditation and the Accrediting Commission. Also read:

- Appendix H. 5—"Adopting and Promulgating Standards and Policies"
- Appendix J. 1—"Student Survey Form"
- Appendix J. 6—"Questionnaire for On-Site Examiners"

Session One — Quiz



This is the first of your self-check quizzes designed to measure your comprehension of the material you have been reading and to reinforce the key points in this session. These self-checks can help you decide if you understand the material that has been presented or that you have read in your assignments. The self-check quiz below is **optional**, but we hope you will take the quiz. The correct responses to the quiz are provided at the end of this session.

Instructions

Select the correct answer below the statement or question:

1. The Accrediting Commission is recognized by the U.S. Secretary of Education and also by:

   a. ACCSCT

   b. COPA

   c. CHEA

   d. FRACHE

2. Which of the following types of programs are currently **not** eligible to be accredited by the Commission?

   a. non-degree programs

   b. associate degree programs

   c. master's degree programs

   d. doctoral degree programs

3. Accreditation is:

   a. an opportunity to improve educational quality

   b. a means of evaluating and comparing courses, facilities, and procedures with those of other schools

   c. a process of granting public recognition to an institution as having met certain published standards

   d. all of the above

4. The Accrediting Commission is made up of:

   a. 5 members

   b. 7 members

   c. 9 members

   d. 10 members

5. The Commission staff assists the Commission in carrying out its mission. Which of the following is **not the responsibility** of the staff?

   a. Counsel applicants seeking accreditation

   b. Observe on-site visits as a member of Examining Committees

   c. Vote to accredit, deny accreditation, or defer accreditation to applicant institutions

   d. Serve as the central communications link between the public, applicants, and the Accrediting Commission

Summary of Session One

It is important to understand that the richness and lifeblood of the DETC voluntary accrediting program depends on the **ethics** and **integrity** of the various participants in the process. The Accrediting Commission depends on YOU, as an evaluator, to be its "eyes and ears." Likewise, the schools you visit depend upon you for an impartial evaluation that will not be unduly colored by any preconceived ideas or prejudices you may have.

The entire accrediting program is built on a sense of personal and corporate trust and goodwill. The rules of the road are clearly described for all to see. There should be no surprises or hidden agendas on any participant's part. Collegiality and openness should characterize all aspects of the evaluation process.

You, as an evaluator, are charged with some rather awesome responsibilities, such as:

- knowing what the standards are and what they mean when applied to "real life" situations;
- preparing objective, comprehensive, and fairly written reports on what you observe; and
- keeping all you see and hear **completely confidential.**

The role of evaluator should be entered into with only the most serious of intentions. It is a job for the individual who believes in the ability of people to "police themselves." Enter this world fully prepared and it will be a professionally rewarding and truly stimulating experience for you!

Correct Answers to Session One Quiz

1. c — The Commission was a charter member and is recognized by the Council for Higher Education Accreditation.
2. d — The Commission does not accredit institutions offering degrees **beyond** the master's degree level.
3. d — Accreditation is designed to meet all three goals listed.
4. b — The Commission has seven members.
5. c — The Commission staff **does not vote** on accreditation; only the Commission may vote to approve, deny or remove accreditation.

Statement of Policy on the Selection of Accrediting Commissioners

Size and Makeup of the Commission

The Accrediting Commission shall be composed of seven Commissioners appointed by the Board of Trustees of the Distance Education and Training Council on the recommendation of the Nominating Committee. Four Commissioners (known as Public Commissioners) shall be from outside the distance education field and three Commissioners shall be from the distance education school field. The Commission shall include in its makeup both academic and administrative personnel.

Qualifications of Public Commissioners

The Commissioners shall come from diversified fields and backgrounds to include, insofar as possible, representatives from government, industry, universities, public schools, and continuing and vocational education.

The Commissioners may not have any affiliation or any interest—financial, advisory or otherwise—in any distance study institution that is accredited or that might at any point qualify to make application for accreditation by the Commission.

In seeking individuals to be recommended for appointment to the Commission, the Nominating Committee shall consider persons whose qualifications and experience would bring expertise that would best help the Commission deal with special areas of school evaluation (i.e., finance, administration, management, curriculum, etc.).

The Commissioners shall have an interest and willingness to serve and should be able to devote the time to do the necessary reading and background preparation and attend all Commission meetings so that they can serve effectively.

In addition to the above, the following informal guidelines shall be considered in appointing Commissioners from outside the distance study field:

1. The personal qualities of leadership, integrity, ability and personal reputation; and
2. Formal education—holding one or more academic degrees.

Qualifications of Institution Commissioners

The Commissioners must be bona fide executive officers of accredited institutions which do not have persons serving on the Accrediting Commission or the DETC Board of Trustees.

The Commissioners shall be appointed so that they will be representative of the variety of institutions in the Distance Education and Training Council and the distance education field insofar as possible.

The Commissioners shall have an interest and willingness to serve and should be able to devote the time to do the necessary reading and background preparation and attend all Commission meetings so that they can serve effectively.

In addition to the above, the following informal guidelines shall be considered in appointing Commissioners from the distance study school field:

1. The personal qualities of leadership, integrity, ability and personal reputation;
2. Formal education—holding one or more academic degrees;
3. Experience in the distance study field with a contemporary knowledge of the field;
4. Demonstrated supportiveness of the accrediting program;
5. Experience as a member of Accrediting Examining Committees;
6. Interest in and support of the Distance Education and Training Council as evidenced by regular attendance at Council functions and personal as well as institutional participation on Council Committees and Council functions.

This Statement of Policy is based on the Distance Education and Training Council's Constitution and Bylaws and past decisions of the Board of Trustees related to Commission appointments.

Session Two

The Process of Accreditation

In this session you will learn about the "steps" in the accreditation process. We will look at this process from the view of a potential applicant for accreditation.

To understand accreditation, you must be familiar with the Commission's standards and policies.

Like all institutional accreditation, DETC's process is a formal one, requiring documentation and deliberate actions on the part of both the applicant and the Commission. There are key tasks each party must carry out for the system to work smoothly. When any of these tasks are omitted or poorly executed, the accrediting process may not work and may fail to protect the public.

As a key player, you need to be thoroughly familiar with the steps in the process of accreditation if you are going to make a meaningful contribution. This session is also particularly important for those of you charged with the task of preparing your institution's application for accreditation. For those intending to

serve as an evaluator, this section will help you understand what an institution has to go through to get ready for the accreditation visit.

The Standards for Accreditation

The standards for accreditation established by the DETC's independent Accrediting Commission are used to determine if an institution should be accredited. In summary form, the standards require an institution to:

- state its educational objectives clearly;
- offer sufficiently comprehensive, accurate, up-to-date, educationally sound instructional materials and methods to meet its educational objectives;
- provide adequate examination services and attention to individual student differences;
- have a qualified faculty;
- enroll only students who can be expected to benefit from the instruction;
- maintain adequate student services;
- have students who express satisfaction with the instruction and services received;
- be honest in its advertising and promotional practices;
- show financial resources that are adequate to carry out all obligations to students;
- use fair and equitable tuition and refund policies that meet the minimum DETC standards;
- have adequate facilities, equipment, and record protection; and

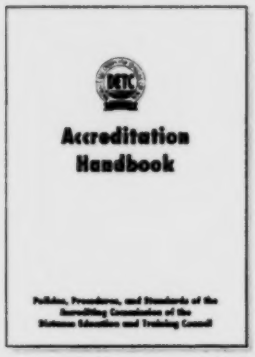
- conduct continuous research and self-improvement studies.

Seven Steps in the Accrediting Process

Remember, the accreditation process is purely **voluntary.** Institutions seeking DETC accreditation voluntarily contact the Commission for current information on the accreditation process and voluntarily apply for accreditation.

The following are the **seven steps** in the accrediting process:

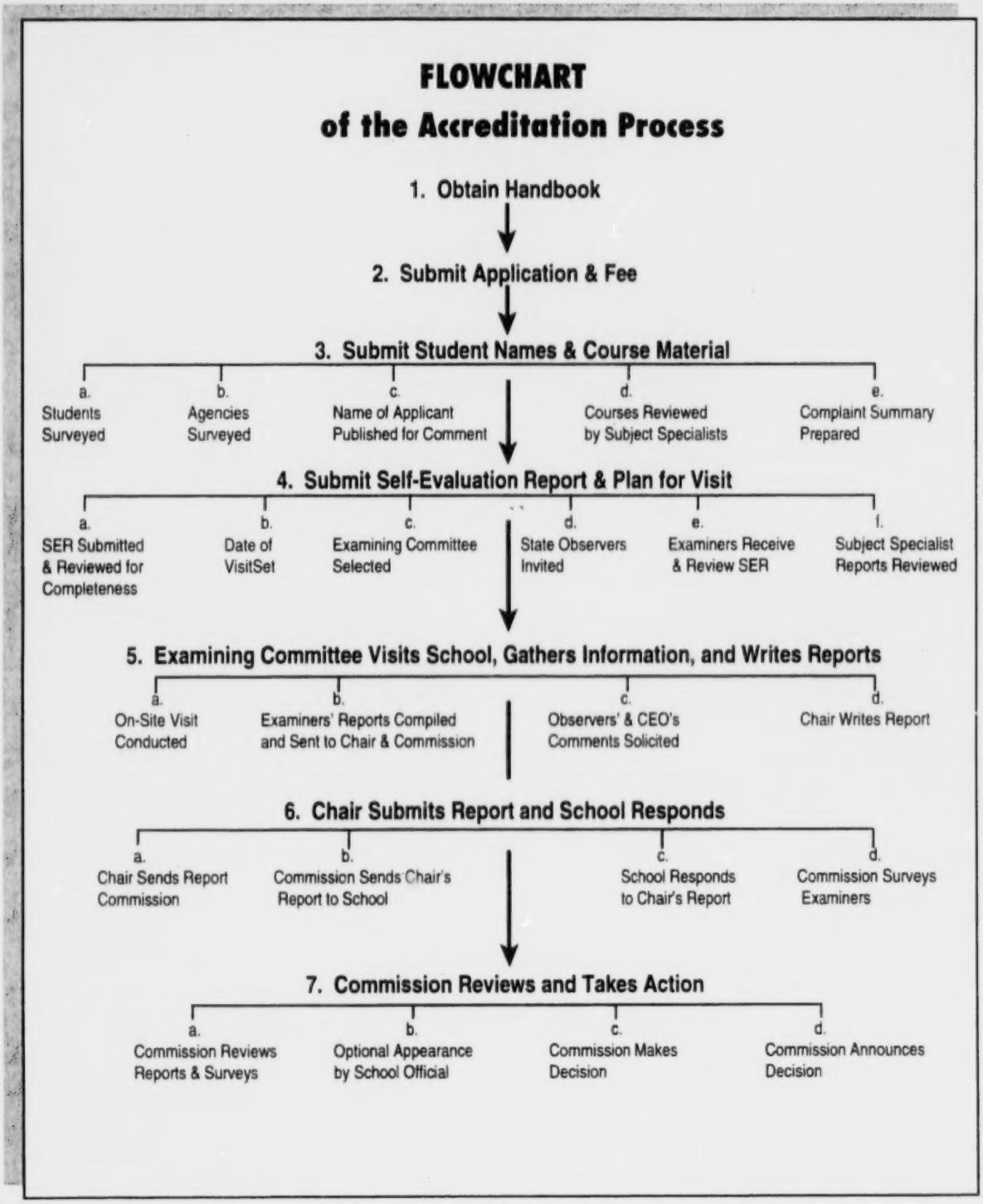
STEP 1. Obtain the *DETC Accreditation Handbook.*



The Accrediting Commission's comprehensive publication on accreditation currently sells for **$20** (U.S.). Any institution interested in accreditation should purchase the *DETC Accreditation Handbook*. It contains all the information an institution needs to understand the DETC accreditation process. This Handbook includes the various on-site examiners' rating forms and application forms the institution will need. For institutions undergoing the five-year re-accreditation process, information is sent to them in August of the preceding year advising them of their upcoming re-accreditation review. Once an institution has received the Handbook, the senior staff should **study it carefully**. This book answers most of the questions about the accrediting process. If the school staff has questions about the review process they should contact the Commission staff.

STEP 2. Submit the Application for Accreditation and Fee.

To initiate the accreditation process, the application for


FLOWCHART
of the Accreditation Process
1. Obtain Handbook
2. Submit Application & Fee
3. Submit Student Names & Course Material
a. Students Surveyed
b. Agencies Surveyed
c. Name of Applicant Published for Comment
d. Courses Reviewed by Subject Specialists
e. Complaint Summary Prepared
4. Submit Self-Evaluation Report & Plan for Visit
a. SER Submitted & Reviewed for Completeness
b. Date of VisitSet
c. Examining Committee Selected
d. State Observers Invited
e. Examiners Receive & Review SER
f. Subject Specialist Reports Reviewed
5. Examining Committee Visits School, Gathers Information, and Writes Reports
a. On-Site Visit Conducted
b. Examiners' Reports Compiled and Sent to Chair & Commission
c. Observers' & CEO's Comments Solicited
d. Chair Writes Report
6. Chair Submits Report and School Responds
a. Chair Sends Report Commission
b. Commission Sends Chair's Report to School
c. School Responds to Chair's Report
d. Commission Surveys Examiners
7. Commission Reviews and Takes Action
a. Commission Reviews Reports & Surveys
b. Optional Appearance by School Official
c. Commission Makes Decision
d. Commission Announces Decision

accreditation (Appendix G. 1 of the *DETC Accreditation Handbook*), and **$300 application fee** must be submitted to the Commission. The Accrediting Commission accepts applications from institutions that have been operating as **bona fide** distance education schools (see definition on page 17 of the Handbook) for at least two continuous years. Upon receipt of the application and fee, the Commission staff will consult with the institution as needed.

STEP 3. Submit Student Names and Course Material.

The names and addresses of the **first 100 students** consecutively enrolled with the institution beginning on the **first day of the 18th month preceding the date of the application** must be submitted on self-adhesive mailing labels. Insofar as possible, the number of students must reflect the **same proportion** of the enrollments for each of the institution's **major course offerings.** For example, if you have 100 students enrolled in two separate courses, then approximately one-half of the students on the mailing labels should be from each of the two respective courses.

These students will be asked to complete a survey form (Appendix J. 1 of the *DETC Accreditation Handbook*) which contains questions about enrollment practices, lessons, student services, and student satisfaction with the course and institution. A self-addressed stamped envelope is provided to assist the student in responding.

In addition, the Commission staff also surveys Better Business Bureaus and Chambers of Commerce, various consumer protection agencies, accrediting associations, and federal and state regulatory agencies, for information on the educational services, business ethics, and general reputation of **all** applicant institutions. The names of applicants are also published in DETC publications *(DETC News, DETC Bulletin, Washington Memo,* etc.), and the public is requested to send any

comments they may have concerning an applicant institution.

A survey of 100 students is usually enough to provide information about student services and satisfaction.

Course materials are required to be submitted as part of the accreditation process. A new applicant for accreditation must submit **two complete sets** of each distance learning or correspondence course. A school undergoing a re-accreditation examination must submit **one complete set** of all course materials. This includes advertising, an institution catalog, enrollment agreement(s), examinations and examination solutions, instructor resumes, and all tools, kits, and equipment provided with the course(s) (see Appendix C. 5 in the *DETC Accreditation Handbook).*

Subject matter experts, who are also called "subject specialists," are selected to review and report on the school's course materials (Appendix J. 4 in the *DETC Accreditation Handbook*). Typically, these reviews take place in the subject specialists' homes or offices. However, if an institution offers a combination distance study-resident program, offers a degree program, or has an extremely large number of courses (i.e., the military institutions), then one or more subject

specialists are appointed to visit the institution for an on-site review of course materials. Course materials submitted as part of an institution's application for accreditation are not returned to the institution because they are consumed in the review process. Each subject specialist submits to the Accrediting Commission a written report on the courses reviewed (Appendices D. 2, D. 4, and D. 5 in the *DETC Accreditation Handbook*).

The Accrediting Commission has a formal complaint procedure for handling complaints lodged against an accredited institution (Appendix H. 3 in the *DETC Accreditation Handbook*). A summary of any complaints received on an institution that is undergoing re-accreditation is compiled and the summary is presented to the Committee at the executive breakfast meeting on the day of the on-site visit (see Step 5 below).

STEP 4. Submit the SER and Plan Visit.

Each applicant institution must study itself and submit a ***Self-Evaluation Report*** (referred to as an "SER"). The SER is prepared in accordance with the provisions of the "Guide to Self-Evaluation Report" (Appendix A in the *DETC Accreditation Handbook*). Usually, an institution will submit ten copies of the SER. However, larger institutions will be asked to submit as many as 20 copies. The SER provides data on all areas of a institution's operation, history, course offerings, student services, finances, etc., along with supporting documentation. The Self-Evaluation Report tells a story about the school. What the Accrediting Commission is looking for is a candid self-analysis of the institution. Preparing the Self-Evaluation Report may take only a few months for a small institution to as many as 9 months for a large school. It is recommended that as many staff and faculty as possible get involved in the preparation of the SER. Preparing the SER is a great learning experience for the institution's staff.

Institutions are instructed to allow sufficient time for writing, editing, and revising the Self-Evaluation Report. This is a key document for the institution's accreditation!

Once the SER is received by the Commission staff it is read carefully to make certain it is complete and all appropriate materials are included.

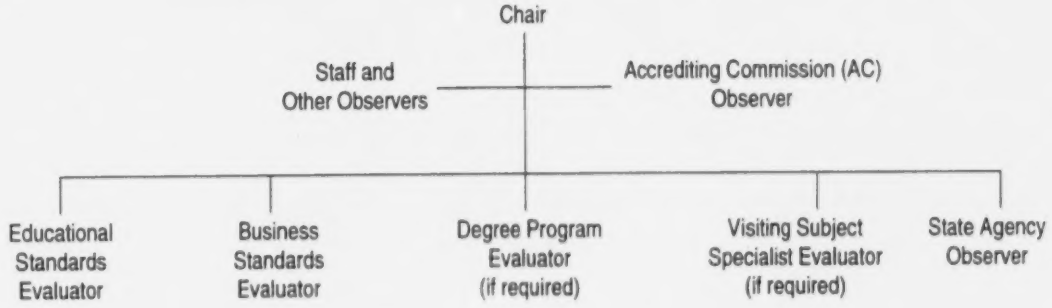
A mutually convenient **on-site examination date** is coordinated with the institution. An Examining Committee is appointed to visit the school for the purpose of verifying the information in the Self-Evaluation Report and to gather additional facts for the Accrediting Commission. The Commission staff will call you and invite you to serve on an Examining Committee. This is where you, as an on-site evaluator, come in! The Commission needs a large talent pool of competent, qualified evaluators from which to choose for the dozens of evaluations that are conducted each year.

On the next page there is a chart showing the organization of the Examining Committee and the principal functions of each Committee member.

Each Examining Committee member is supplied with the school's Self-Evaluation Report, rating forms, and the *DETC Accreditation Handbook,* well in advance of the date of the on-site visit. Therefore, there is plenty of time for you to prepare for the review. It is important that you read all of this information before you participate in the on-site visit.

When planning the visit to the institution, representatives from state licensing bodies and federal agencies are notified of the forthcoming visits and are invited to participate as observers in the process. They are encouraged (but not required) to submit written reports to the Chair at the conclusion of the visit.

The Organization of the Examining Committee



All Committee Members

- verify information in SER
- evaluate school using standards and rating forms
- submit reports to the Chair and Executive Secretary

Chair

- coordinates visit
- assures evaluators complete their tasks during visit
- sets date for submission of reports
- prepares Chair's report and submits it to the Executive Secretary

Educational Standards Evaluator

- examines school using standards and rating forms
- verifies special areas:
  - **bona fide** distance education and two years of operation
  - course ownership or rights
- interviews education director, student services director, registrar, instructors, faculty, and president/CEO
- handles special concerns:
  - reviews student surveys
  - reviews complaints

Degree Program Evaluator

- examines school using standards and rating forms
- handles special concerns
- reviews degree curriculum & courses
- interviews faculty

Business Standards Evaluator

- examines school using standards and rating forms
- reviews special areas:
  - financial stability
  - legal operation
  - inventory
  - advertisements, enrollment forms, catalogs
  - refund policy and refunds made

Visiting Subject Specialists

- reviews courses on site
- examines school using standards and rating forms
- evaluates special areas:
  - facilities
  - existence and condition of equipment
- interview:
  - faculty
  - instructors

AC Observer

- assures AC procedures are followed

Staff Member

- coordinates schedules and logistics

State Agency Observer

- participates as a member of the committee
- provides pertinent information from state files
- observes school examination and process
- files report to Chair or Executive Secretary (optional)

A copy of the SER is sent to each member of the Examining Committee prior to the on-site visit to the institution. Each examiner reads the SER carefully and uses the "Examiner's Rating Form for All Institutions" (Appendix D. 1 in the *DETC Accreditation Handbook*) to consider the institution's responses to each question. The examiners make notes of any questions not answered in the SER or areas in which they may have concerns. The examiners use their notes to form their list of questions to be asked or items to be checked at the on-site visit. The examiners **are not limited to the questions on the examiner's rating form** and are encouraged to ask any pertinent questions related to the standards.

The educational standards examiners are also sent any subject specialist reports that are received by the Commission before the on-site visit. They review these reports for any comments they may decide to include in their reports.

STEP 5. Examining Committee Visits School, Gathers Information and Writes Reports.

We will go into greater detail later about the on-site visit, but for now here's a brief overview.

Prior to arriving at the institution, the Committee meets at an executive breakfast (or possibly lunch or dinner) meeting to discuss and review the SER and any questions or concerns

Each evaluator works in his or her areas of expertise to make certain that all the standards are covered.

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they may have. Then, when the Committee arrives at the institution, they are given a brief tour. The Examining Committee gathers information during a one or, in some cases, two day on-site visit. Each Committee member works in his and her own area of expertise during the examination, meeting with the entire Examining Committee periodically during the review. For example, the educational standards evaluator reviews the student surveys and complaints and verifies that the institution has had two years of operation as a bona fide distance education school. It is the job of the Committee Chair to be sure that each evaluator completes his or her assignments completely and on time.

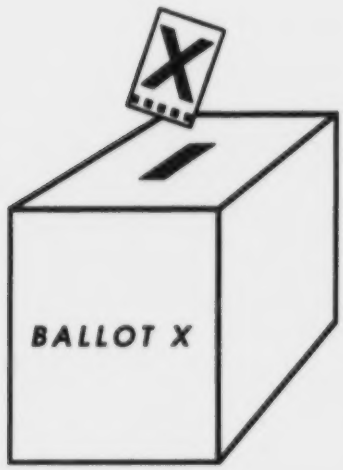
Around noon, the Committee meets for lunch to consolidate its notes, assess its progress, and discuss any changes in the visitation schedule that may be necessary.

After the interviews are finished, the Committee meets to discuss its reviews and to make certain all the appropriate people have been interviewed. It also agrees upon a date for submitting reports to the Chair. **There is no exit interview** with the school's officials. The Chair may ask for further information that the Committee will need for its reports, the Chair also informs the CEO of an approximate date when he or she will receive a copy of the Chair's Report. Because judgment regarding accreditation rests **solely with the Accrediting Commission,** neither the Chair nor any member of the Committee is authorized to say anything that implies acceptance or rejection of the institution by the Commission. The fact that the institution knows it will receive a written report of the Committee findings prior to the Commission's action mitigates any need for a formal "exit interview" or for Committee members to indicate "how they feel" about the institution or convey any of their findings.

After the on-site review, each evaluator prepares a report that is mailed to the Commission staff, with a copy sent to

the Chair of the Examining Committee. Often, reports are sent via "express" overnight mail to conserve time. The Chair then prepares a Report which is subsequently sent to the institution's CEO for comment prior to the Accrediting Commission's meeting. Any observers/representatives from state licensing bodies and/or federal agencies are strongly encouraged to send their comments to the Commission and the Chair.

Once the Chair receives all of the examiners' reports, the Chair then prepares a Chair's Report. In the Report, the strengths and deficiencies of the institution are noted and recommendations may be made.



The Commission votes its action based on the findings set forth in the on-site Committee Chair's Report and the applicant's response.

STEP 6. Chair Submits Report and School Responds.

The Chair's Report is sent to the Executive Secretary of the Commission. A copy of the Report is forwarded to the CEO of the applicant institution for comment. The institution is invited to submit written comments on the findings in the Chair's Report to the Executive Secretary before the Commission meets. The Commission also surveys the members of the Examining Committee for any comments they may have

on the institution's SER, the on-site visit, and the accreditation process.

STEP 7. Accrediting Commission Reviews and Takes Action.

The Accrediting Commission meets twice a year, in January and in June, to take action on institutions' applications for accreditation. At each meeting the Commission reviews information and documentation on the schools applying for accreditation or re-accreditation. The Commission considers the Chair's Report; the school's response to the Chair's Report; subject specialists' reports; student surveys; information gathered from Better Business Bureaus, Chambers of Commerce, consumer agencies, accrediting associations, and federal and state regulatory agencies; the institution's advertisements and catalogs; and any pertinent communication between the institution and the Accrediting Commission. The institution is also given an opportunity to make—at its option—a brief oral presentation to the Accrediting Commission at the meeting prior to the decision on the applicant.

The Commission can take one of four courses of action. It may:

1. accredit a new applicant institution, or continue an institution's accredited status;

2. accredit, or continue accreditation, with stipulations that a school must agree to meet within a period not to exceed a maximum of 12 months;

3. defer a decision pending receipt of a Progress Report, the meeting of a condition, or submission of additional information; or

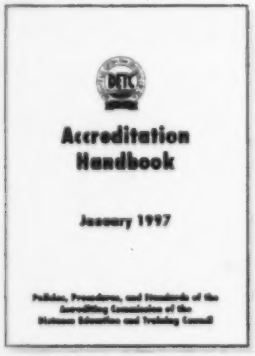
4. deny accreditation to an applicant, or withdraw accreditation from an accredited institution.

In the case of a negative action, there is an established appeals and reconsideration procedure that the institution can follow. After a final decision is made the Accrediting Commission notifies other appropriate recognized accrediting agencies and state and federal agencies about the actions taken.

Generally, the entire accreditation process takes from six months to a year to complete, so institutions need to plan ahead to meet all Commission deadlines.

The accreditation process must be repeated at intervals of not more than **five** years. The Commission may conduct a review of any accredited institution at any time. Once an institution is accredited, it must file an Annual Report to the Commission.

Introduction to *DETC Accreditation Handbook*



The current edition of the *DETC Accreditation Handbook* was initially published in January 1995 and undergoes routine updates each year. **Always check with the Commission staff to make certain you have the latest edition of the Handbook.** It was created after a great deal of hard work and extensive editing of the previous publication, *Home Study School Accreditation: Policies, Procedures and Standards.* It was the intent of the Commission staff to streamline the accreditation process. This was done to make the entire process easier for on-site evaluators and for institutions applying for accreditation or re-accreditation. The *DETC Accreditation Handbook* is a compilation of the Accrediting Commission's policies, procedures, and standards. It is the Commission's desire that distance education institutions use this Handbook to build or refine their internal policies. The Handbook helps institutions to assure that their programs meet

the standards of good practice and provides a blueprint for sound practice in distance learning.

In order to implement the process of accreditation as described in the Handbook, the Accrediting Commission published accreditation standards. These 12 standards, which were mentioned earlier, are used by the Commission to measure the educational quality, financial responsibility, administrative competency, and general worthiness of an institution for distance education accreditation. These standards are the key tenets of the DETC accreditation process. They are the stated criteria which characterize quality and excellence in distance learning.

Several documents found in the *DETC Accreditation Handbook* are helpful for institutions, on-site evaluators, and Commissioners to understand the meaning of the standards. These documents will also help institutions in preparing materials that the Commission will use to assess the institution. The documents in the Handbook are:

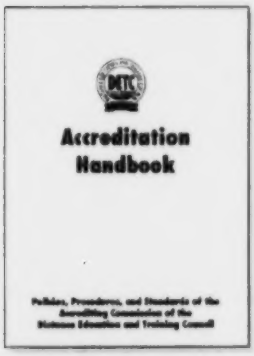
- **Appendix A:** Guide to Self-Evaluation Report and Institutional Summary Profile;
- **Appendix B**: Other Guides to Self-Evaluation for providing information on special activities, changes, or programs at the institution;
- **Appendix C**: Special Policies for understanding the standards in the case of special institutions; and
- **Appendix D:** Rating Forms for use with accreditation standards and special rating forms that supplement the general rating form.

You will note that the numbering system in the "Guide to Self-Evaluation Report" found in Appendix A parallels the questions in the "Examiner's Rating Form for All Institutions" found in

Appendix D.1. There is also a chart on page 40 of the Handbook that contains an index for special guides, policies and rating forms depending on the circumstances requiring Commission actions.

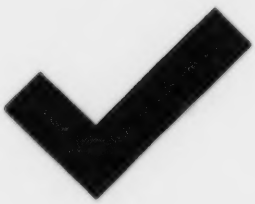
The Commission wants to make the accreditation process as clear and understandable as possible for all participants. Readers will find the *DETC Accreditation Handbook* an informative, easy-to-follow guide.

Handbook Reading Assignment



Please take out your *DETC Accreditation Handbook* and read the sections on, "The Process of Accreditation," "Q & A on Accreditation," "Introduction to Standards, Guides, Policies, and Rating Forms," and "Accreditation Standards." (Consult the "Contents" for the appropriate page numbers.) The material presented above briefly describes the accreditation process. For greater detail, please study the Handbook.

Session Two — Quiz



The self-check quiz below is **optional**. We hope you will take the quiz to check your comprehension of what has been presented. Correct responses to the quiz are provided at the end of this session.

Instructions

Select the correct answer below the statement or question.

1. The accreditation process must be repeated at intervals of not more than _____ years?

a. Three
b. Four
c. Five
d. Seven

2. Among nationally recognized accrediting commissions, having more public members than industry representative members is:

   a. a very common occurrence
   b. found in about one-half of all Accrediting Commissions
   c. a very rare occurrence, as with DETC

3. To apply for accreditation, an institution must have operating experience with sound and ethical practices for at least _____ year(s)?

   a. One year
   b. Two years
   c. Three years
   d. Four years

4. One of the principal standards for enrolling individuals is that all students must have:

   a. the ability to complete the course of study in one year
   b. sufficient funds to prepay the entire cost of the course
   c. the ability to benefit from the course in which he or she enrolls
   d. a computer with Internet access

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5. When an institution applies for accreditation, it must submit names of students to verify the practices of the institution. Which group of names must the institution submit?

    a. a random sample of the names and addresses of 100 students who were enrolled during the prior two years

    b. the names and addresses of the first 100 students who were consecutively enrolled beginning the first day of the 18th month preceding the date of the application for accreditation

    c. the names and addresses of 100 graduates who completed the course during the prior 12 months before the date of the application

    d. the names and addresses of 100 students who began the course, but dropped out of the course during the prior 12 months before the date of the application

6. The entire accrediting process for an institution will take between:

    a. One and three months

    b. Four and six months

    c. Six months and one year

    d. One and two years

7. Normally, the DETC Accrediting Commission **does not act to**:

    a. remove an institution's state license to operate

    b. accredit a new institution

c. deny accreditation to a new applicant

d. defer a decision pending the submission of additional information

Summary of Session Two

As you have read in this session, the accreditation process involves several tasks which have to be performed in a timely fashion for the process to function smoothly. All of these steps add up to what is intended to be a well thought out and logical method for evaluating an educational institution against a published set of standards.

People make the process work. Because it is a completely **voluntary** process, a heavy measure of goodwill, mutual trust, and cooperation is expected from all the participants in the process. It will not work as intended if it is allowed to become routine, legalistic, or lightly regarded.

Correct Answers to Session Two Quiz

1. c — Once an institution is accredited it undergoes a complete re-evaluation at least every five years.

2. c — The Accrediting Commission of DETC is the only nationally recognized accrediting body with more public than institutional members.

3. b — An institution must have two years of ethical and sound business practices before applying for accreditation.

4. c — The institution must determine that the student has the ability to benefit from the course of study that he or she takes.

5. b — The institution must submit the names and addresses of the first 100 students who were consecutively enrolled begin-

ning the first day of the 18th month preceding the date of the application for accreditation.

6. c — Most institutions should be able to complete the accreditation process in from six months to one year.

7. a — The Commission does not regulate state licensing laws. It can only approve, remove, or deny accreditation for an institution.

Session Three

Serving as an Accrediting Commission Evaluator

In this session you will learn what is expected of you as an evaluator, what qualities are important, why you would want to be an evaluator, how you are expected to handle yourself prior to, during, and after the evaluation, and what you should expect during the on-site visit.

Qualities of an Evaluator

The evaluators helping the Commission are vital to the accrediting process. As an on-site evaluator, you are:

- the heart of the peer review system;
- an appreciated volunteer;
- the "eyes and ears" of the Commission; and
- the front line "judge" who must interpret the standards and apply them to the applicant institution.

A good evaluator has the qualities of common sense, fair play, being a good listener, a diligent reader who reads all information ahead of time, avoids the urge to act as a consultant, is trustworthy, discreet, punctual, businesslike, a good and accurate writer, and someone who is serious about the accrediting process. The Commission staff will help you and all of the evaluators do your job. But, the Commission staff also depends upon you to do your part.

Why Be an Evaluator?

Serving as an evaluator can consume up to 4 or 5 days of your life as you prepare for, participate in, and complete the necessary

The evaluator does the acid test to see the difference between what a school says, versus what it actually does.

follow-up reports after an on-site visit. While your travel and hotel expenses are reimbursed by the Commission, the time away from your job and family and other responsibilities is part of your contribution to the distance learning field. Being an evaluator is a "labor of love" for most of the professionals who volunteer to take on this complex task.

Here are four possible reasons for you to serve as an evaluator:

1. **It is stimulating to review your peers.** As an evaluator, you get to see other educational institutions and how they go about providing distance learning services to students. It is also beneficial for you to review the accrediting process as you conduct your evaluation of the institution.

2. **It is professionally rewarding.** Evaluators often learn more about their own approaches to distance learning and also pick up some new ideas and methods of carrying out distance education. This "cross-fertilization" helps evaluators grow in their profession.

3. **It can be viewed as a professional obligation** to give back to the field—the DETC—some of what you have received. After all, other volunteers took their valuable time to evaluate your institution. Also, by including constructive

suggestions in your written report, you are assisting the institution you are evaluating the become a better institution.

4. **Your service helps protect the public and students** and preserve the collective reputation of the distance learning field.

Prerequisites for Evaluators

Not everyone is selected to serve as an evaluator by the Commission. Before someone is asked to evaluate a school as a full-fledged examiner, the following prerequisites must be met:

- The evaluator must have attended the training seminar for evaluators or completed this distance education course and served as an Examiner-in-Training on at least one on-site visit.

- The individual must have sufficient knowledge of and experience with distance learning methods to allow him or her to evaluate institutions.

- If the individual is a staff member at an institution, he or she must have the reputation of running a distance education institution properly and represent a quality institution **that is known to observe the standards of the Commission.**

- The individual must not bring any conflicts of interest to the evaluation of the institution (i.e., prior business dealings with the institution, direct competition, etc.) that may invalidate their participation.

In order to be asked to be an evaluator again, how well you performed on prior evaluations is a prime consideration for future assignments. The Commission staff considers the following questions for each individual evaluator:

> Were all necessary reports received by the on-site Committee Chair on time?

> Were all assigned areas properly evaluated during prior reviews?

> Was the individual punctual, professional, and well-prepared for the evaluation?

> Were the individual's transportation expenses documented and reasonable?

> Were there any conflicts between the evaluator and the other members of the evaluation team?

> Was the individual discreet and did he or she maintain the confidentiality of the peer review process?

The Commission depends upon your judgment in conducting school evaluations.

Duties of the Evaluator

The Accrediting Commission depends upon **you** as part of the peer review process. You have certain responsibilities to fulfill. These duties, while relatively simple, are fundamental to the success of the peer review process. They are to:

1. **Understand the type of institution you are reviewing.**

   Before you set out on a site visit, you must understand the type of institution you will be evaluating. For example, if it is a degree-granting institution, be sure you have the proper rating forms for this type of institution.

2. **Understand and keep to the schedule for the on-site visit.**

   Each on-site visit is "timed to the minute" to provide you and the other evaluators with the maximum amount of time at the institution. In addition to keeping transportation schedules in mind, the Committee Chair also has to be sure that all evaluators are in place and arrive at the institution on time. It is your responsibility to be aware of the schedule for the visit and **to observe it.**

3. **Study the SER thoroughly and keep a list of questions that you will ask school personnel.**

   The institution's SER is the key document for your visit. You need to read it carefully, noting where there is missing information or where the statements are unclear. Come to the evaluation prepared to ask the appropriate school personnel questions about the SER and be sure to share their responses with the Committee Chair.

4. **Follow the Examiner's Rating Form and fill it out completely.**

   You will receive an examiner's rating form to complete

(Appendix D. 1 of the *DETC Accreditation Handbook*). This document tells you, as an evaluator, what items to look for. Be sure you answer each point or note on the form why you were unable to answer the question or point. At the end of each section you are asked if the institution meets the standard overall. Transfer your summary of each standard to the "Summary of the Examiner's Rating Form" (Appendix D. 1 in the *DETC Accreditation Handbook*) and send the summary with your supporting commentary to the Chair and to the Executive Secretary.

5. **Do as much background checking as possible while you are at the institution.**

   Because **you** visit the institution—the Commission doesn't—it is important that you cover all possible questions concerning the institution and its operation. If you are not sure about something, **ask!** If you get unclear or evasive answers, then document that in your report. Remember, the Commission is not going to be there with you, so the Chair's Report has to stand on its own. Resist the temptation to refer complicated issues "up the ladder" to the Commission.

6. **Interview all staff with responsibilities in your area of the review.**

   While you are on-site, be sure to interview **all** staff members who have duties in your assigned area. This includes both the professional and clerical staff. You can learn a lot by comparing notes on how different staff members answer similar questions. Document any differences between what a professional staff member may have said versus the comments of a clerical staff member. Ask the supervising executives to clarify any differences between the two staff members.

7. **If you have insufficient information or reports, ask the school staff for the missing information.**

Sometimes the institution will not send complete information with the SER or the information is not sufficient for you to do your evaluation. If you let the Commission staff know **well before** the on-site visit what missing information you need, the staff will communicate that to the school personnel. If you note the missing information while on-site, then ask the personnel for the reports or records. In some cases it may be impossible for the institution to provide this information immediately. Note this fact in your report, and the institution can send the missing information to the Chair before the final report is completed.

8. Schedule enough time during the on-site visit.

In evaluating some institutions there is a common evaluator complaint: there never seems to be enough time to do the job! Therefore, use your time wisely. Do not waste time. If you have gathered enough information from a staff member and still have others to see, then terminate the interview and move to the next staff member. During staff interviews focus "like a laser beam" on your burning questions. Do not let a school staff member squander your time so that you cannot complete your many assignments.

9. Send your report with comments to your Chair on time and complete.

The Chair of your evaluation team also has other responsibilities and will be depending on you for your report. If you have a two-week deadline and your report is finished in one week, then send it to your Chair. Be sure that each point is answered on your summary evaluation form and add detailed comments on what you observed, what you found, and whether you think the institution is meeting the standards of the Accrediting Commission. Make certain that you have explained and documented any "No" ratings in the section

"Meets ___ Standard Overall." Missing a report deadline is fatal to those desiring to be selected for future assignments!

10. **Destroy all notes, unused or unneeded forms, etc., after the evaluation.**

    Once you have sent your report to the Chair and the Commission staff, and you have received a written acknowledgment from the Commission staff that your report has been received, **destroy the SER and all of your notes**. The Commission depends on the written report prepared by the Chair. Maintain the confidentiality of the peer review pro-

The Sins of an Evaluator

- ✖ Do not consult with the institution. Your only job is to evaluate and to gather facts. It is inappropriate to offer advice at this stage of the process, even when solicited.
- ✖ Do not predict an Accrediting Commission decision. It is not professional to give predictions on how the Commission will vote weeks or months later.
- ✖ Do not accept "prepared work" from the school staff—seek out the information for yourself and verify the material you have been presented in the SER.
- ✖ Do not let SERs sit in the open in your office. Safeguard them as if they contained "secrets." Treat them as you would want your institution's SER treated.
- ✖ Do your report immediately when you get home. Write the report while it is fresh in your mind—do not delay a week or two. Do not let it become a "when I get around to it" item.

cess, destroy all other notes—including any computer files—concerning your evaluation.

11. Do not discuss the site visit with colleagues

The site visit is **confidential** for all of the members of the evaluation team. Do not discuss the visit with colleagues or others. Allow the Commission to make its decision based on the Chair's Report. Do not share "observations" with the school personnel you visited or with other individuals. The process is, and must continue to be, confidential. Do not discuss your visit afterwards with others.

Each member of the evaluation team has certain tasks to complete during the school visit.

The Ethics of the Evaluators

The Commission considers the ethics of its evaluators a prime asset in the accreditation process. The Commission seeks ethical and honest individuals to serve as its evaluators. The Commission describes the standards of ethics that you as an evaluator, are expected to uphold (Appendix J. 3 in the *DETC Accreditation Handbook*). The following standards guide you as you do the Commission's work.:

- **Perceptions Matter in the Review Process**

Sometimes in our lives we see something, make a judgment about someone, and later find out that we made the incorrect decision. But, the harm has been done, and we may have acted based on the perceptions rather than the facts. This can also happen during the evaluation. If an evaluator appears to be too friendly with the school staff, even though he or she may make a correct finding, an incorrect perception by the school staff could occur. To prevent misperceptions from happening while you are involved in an institutional evaluation (before, during and afterward), evaluators must maintain a professional deportment at all times when dealing with the school personnel.

- **Declaring Financial Self-Interest**

The Commission attempts to screen out potential conflicts in self-interest before inviting an individual to serve on an evaluation team. In some rare cases the Commission staff may not be aware of a self-interest that has occurred between the individual and the institution. It is **your** obligation to inform the Commission staff of any potential or actual conflicts and to let them help you determine if you should accept the appointment.

Questions to Help Determine Conflicts in Self-Interest

Some of the questions you may want to ask yourself about a potential conflict of interest in the institution you are going to evaluate are:

- Do I have a direct or indirect financial interest in seeing this institution become accredited not accredited? Is this institution a direct competitor or, if accredited, would it become a competitor?
- If the institution is a publicly traded company, do I own stock, directly or indirectly, in the school (such as through a mutual fund, pension, etc.)?
- Do my family or close friends have a direct or indirect financial interest in the outcome of the review? Do I have many friends at this institution who may pressure me to give only positive ratings and remarks on the institution?
- Has my own institution had any recent business involvement with the applicant institution?

If the answer to any of these questions is "**Yes**," then talk to the Commission staff to determine if you should recuse yourself from the evaluation. **The best counsel we can offer is that when there is an appearance of a conflict, there is a conflict!**

- **Being Impartial in Your Evaluation**

If you are a friend of a senior staff member of the institution you will be visiting, or if you have been a paid or unpaid consultant to that institution, you may not be able to be impartial in your evaluation of the institution. Here again, a few questions can help you decide if you should serve on this evaluation team:

- Do I have a personal or business relationship with the institution, its officers, or staff that would give the impression of being biased either toward or against the institution?
- Based on my prior dealings with the staff, both positive and negative, can I impartially consider their application for accreditation?
- Have I already made up my mind about the institution, for whatever reason, before I have read the SER or visited the institution?

If the answer to any of these questions is "**Yes**," then contact the Commission staff to discuss the matter.

- **Protecting Confidentiality Before, During, and After the Visit**

The last ethical consideration you, as an evaluator, must answer is, "Am I able to keep confidential the information and findings of the peer review process?" As mentioned several times in this course, evaluators have a unique relationship to the accreditation process. You, and your fellow evaluators, are the representatives of the Commission and the finders of the facts in the case. You **do not** make the final decision. That function is left to the

Commission alone at a meeting called for that purpose. Some people have problems keeping secrets—you know the person who just has to let you know some "juicy gossip." You probably have friends who cannot wait to tell you something about someone you know. Unfortunately, these types of individuals make poor evaluators. The Golden Rules for being a DETC evaluator are to do your homework, observe, ask, and evaluate, then forget the details. There is no place in the DETC accreditation program for those who would betray the confidence that the process requires.

For school representatives serving on on-site visit teams, this may be even more difficult. This is true if you even casually know the school personnel involved. On very rare occasions, it might happen that, on the day after the site visit, someone from the institution might call his "friend" on the committee to find out "how it went." This puts the evaluator in a very uncomfortable position. Our only advice when this happens is to remind the "friend" of the confidentiality of the peer review process and decline to speculate how the Chair's Report will be written or how the Commission may eventually vote.

In this peer review process you are expected to observe the highest standards of conduct. The Commission expects you to keep confidences and maintain the integrity of the peer review process. If you are unsure of your responsibilities to the Commission, contact the staff for assistance.

Makeup of the Examining Committee

Your fellow evaluators are similar to yourself—professionals with different skills and responsibilities. Your committee is composed of a Chair, educational standards evaluator, business standards evaluator, possibly one or more visiting subject specialists, and an Accrediting Commission observer. A representative from a state agency is always invited but may not attend.

Each evaluator has different duties and responsibilities (see the chart on the "Organization of the Examining Committee" on page 31). If you are the business standards evaluator, for example, your function is to review the business operation of the institution. In preparation for the visit you should carefully review the business sections of the SER.

Depending upon your skill, you may review a particular section of the SER more carefully than other sections. But, be certain to **read the entire SER!** You may pick up something that one of your fellow evaluators overlooked. Share your insights freely with the other evaluators. An educational standards evaluator might remark, "Did you notice the language in their latest magazine ad? It doesn't seem to reflect the course objectives."

Remember, the best evaluators are from Missouri—the "show me" state! Ask questions! Have an honest skepticism about what you read, and ask to verify the data that went into completing the report.

Strategies for Preparing for an On-Site Visit

Over the years we have found a number of useful strategies that seem to help most new evaluators (and even experienced evaluators) prepare for the on-site visit.

1. **Read the SER completely through once.**

   Before you begin to concentrate on your section of the SER, read the entire document through once to form an opinion of the institution. We have found that first impressions are usually correct.

2. **Read the SER with your rating form in hand.**

   As you read through the SER a second time, have your rating form with you. Notice that the questions in the "Examiner's Rating Form for All Institutions" (Appendix D. 1 in the

The SER is the key document you need to prepare for the on-site visit.

DETC Accreditation Handbook) coincide with the numbers and statements in the "Guide to Self-Evaluation Report." As you study the SER, note the following:

- **any conflicting statements**—indicate on what pages they appear;
- **any missing or incomplete information**—indicate where you expected to find the information; and
- **any sub-standard practices or any violations** of **the standards or policies of the Commission**—for example those that concern advertising.

3. Prepare a list of questions for the school staff.

Before you arrive at the school, have a list of questions for the institution officials to answer. Try to guess who is the correct person to answer the questions. Be sure to share your questions with the other evaluators at the breakfast meeting on the day of the on-site visit.

4. Fill out the rating form in pencil based on your reading of the SER while at home.

We have found that you can answer most of the "Yes" and "No" questions on the rating form in pencil ahead of time by finding the answers in the SER. You can change your answers later when you verify the information at the on-site visit. By marking your answers before hand, much of the

hard work is already done weeks **before** you go to the institution. It is important to safeguard your notes and rating forms. Do not let anyone at the institution view your materials.

5. **Re-read the SER while you are traveling to the site or the evening before the visit.**

   Re-read the SER on the airplane as you travel to the site. (Please, not in your car while driving!) If you do not have time to re-read the SER on the way to the visit, then schedule time the evening before the school visit. The last review of the SER is important because it refreshes your memory about the details of the institution. (We know of one conscientious DETC examiner who makes it a practice to arrive early at the hotel the day before the on-site review. He spends several hours in the quiet of his hotel room refining his questions.)

Each of these tips will help make your visit to the institution profitable and productive.

The On-Site Visit

The Commission wants you to have a pleasant, safe, and productive on-site visit. Although many of the following items were discussed in Session Two in the steps of the accreditation process, it won't hurt to refresh you memory. Over the past few years we have found that by reviewing the following areas you can make the school visit more successful.

- **Hotel and Transportation Logistics**

  The Commission staff makes your hotel reservations and provides transportation from the hotel to the institution. You are expected to make your own airline reservations and plan for any transportation you will need to the hotel. The Commission pays for all transportation and hotel

expenses upon receipt of your expense form. You are responsible for incidental expenses, including personal phone calls, made from the hotel while on the visit. If for some reason your travel schedule changes, especially at the last minute, be sure to let the Commission staff know **immediately**. This is very important, especially if you become ill at the last minute or are delayed enroute to the site. If nothing else, call the hotel where the Committee is staying and let your Chair or the Commission staff member know that you will be unable to participate in the visit. Room reservations are usually guaranteed for late arrivals, so if you are not going to make the visit, please cancel your room reservation as soon as possible so the Commission won't be charged. Try to get any available discounts for your coach air transportation, e.g., advanced, non-refundable tickets.

You must submit the expense reimbursement form which is sent to you before the visit for hotel, parking, and other costs along with appropriate receipts. It goes without saying, but please keep your expenses reasonable.

- **The Executive Breakfast Meeting**

  On the morning of your on-site visit, your Chair will schedule an executive breakfast meeting for all of the evaluators. This meeting is usually held in a restaurant in the hotel where the evaluators are staying. The time and location will be on the examination schedule. This is an important session because:

  1. you will meet the other evaluators;
  2 the responsibilities for the institution visit will be divided up;
  3. you can share insights and questions with the other evaluators based on your reading of the SER; and

4. any subject specialist reports, complaints received from the public, and student surveys are reviewed at this meeting.

Please be prompt to this meeting and bring all necessary materials with you. Be ready to volunteer if your Chair needs an evaluator to look at something special during the institution visit.

- **The Tour of the School**

When you arrive at the institution, the Committee will meet with the CEO/President and others on the faculty and administrative staff. The purposes of this meeting are to get acquainted, agree upon a schedule and plan of procedure, and have the CEO/President state the institution's philosophy and purpose and describe the institution's organization and office layout. The Committee members are shown to the private room that will serve as their "headquarters" while on the visit. You will then be given a brief tour of the facilities. Remember, most DETC schools are strictly distance education institutions, so they **will not have** a traditional campus! Look around the institution. Observe the staff and what are they doing. Is it a "show," or are they doing actual work. **Do not** interview or question any staff members during the tour—there will be time for that later.

- **Visits With the Staff**

The best on-site interviews are conducted one-on-one in a quiet area. After your tour, you return to the meeting room. Now is the time to begin your visits with the appropriate staff. Tell the school representative you want to see that you need a place where you can talk privately. Remember to use your rating form as you interview the

staff. Using the form will help you to ask all the appropriate questions.

Usually, your on-site responsibilities will include inspecting or auditing files. Audit a randomly selected group. Read all correspondence from students, to students, and from others (e.g., state regulators, Better Business Bureaus, etc.) to the institution. Use your eyes and ears to gather facts and impressions. Focus on the areas where problems seem to surface during the file review.

- **The Working Luncheon**

  The institution will arrange for a working luncheon for you and the other evaluators. Please use this time wisely. If the lunch is to start at noon, then be certain to be back in the meeting room at noon. During lunch your Chair will ask you for a brief oral report on what you have found that morning. Be as crisp and candid as possible in your remarks. The Chair will also ask you to list what you need to do to complete your review that afternoon. The Chair may also make additional assignments to follow up on concerns found that morning, or to help another evaluator who may be running behind time.

  At this time, the Chair will establish a deadline for the reports to be submitted to him or her and handle any last minute logistics for the return home. The working lunch is important in organizing your time during the afternoon.

- **The Conclusion of the Site Visit**

  Your on-site visit will be scheduled to end at a certain time determined by the Chair. Please be sure you have completed all tasks by that time. Because other evaluators have planes to catch, etc., it is important all evalua-

tors leave together and on time. The Chair will have a brief meeting with the CEO/President and thank him or her for the hospitality. The Chair may request additional information if needed. No indication is given to the school staff on how the visit went. Everyone should maintain the confidentiality of the peer review process.

- **After the On-Site Visit**

  After the institution visit your duties are not yet finished. You still have to:

  > complete your report to the Chair. Contact the Commission staff for help if you are having problems with a specific part of the report. Remember to keep to the deadline established for submitting your report.

  > submit your expense reimbursement form, with appropriate receipts, to the Commission. Your reimbursement will be processed as rapidly as possible. The sooner you send in the form, the sooner your reimbursement will be mailed to you.

Other Sources of Information

The Commission, in its review process, looks at a number of other factors in making its decision about a particular institution. Here we will look at some other sources of information and how you, as the evaluator, also can use them.

- **Surveys from the Institution's Students**

  The Commission's staff sends out 100 surveys randomly drawn from the enrolled students (Appendix J. 1 in the *DETC Accreditation Handbook*). Remember, these are students who were consecutively enrolled beginning the first day of the 18th month preceding the date of the application for accreditation. You will receive these surveys before the on-site visit, along with your copy of the SER.

The Commission receives about a 40-50 percent return of student surveys. Experienced evaluators often scan the forms quickly, noting any problems reported by the students. For example, if you find that six students reported trouble with a sales representative (they checked "No"), then the business standards evaluator will pay special attention to how the institution supervises its sales representatives. Likewise, if too many answered "No" to the questions relating to the student services provided by the institution, this should be a "red flag" to the educational standards evaluator to review these areas carefully.

Sometimes the student surveys are the only way the Commission has to assess student satisfaction. Good evaluators use these "windows of information" when deciding what areas of the school to zero in on during the visit.

- **Student Complaints**

Distance learning students are, for the most part, articulate and self-motivated. When they are unhappy about a course or the institution, they let the institution and sometimes the Commission staff know. While student complaint letters may be "misplaced" by the institution, the letters sent to the Commission staff are often an insightful indicator of an institution with poor services or an institution that is in financial trouble.

The Commission staff reads the letters and looks for the following patterns:

- increasingly larger number of students who report late receipt of lessons. This could indicate that the institution is having financial difficulty ordering and shipping lessons.

- late return of tests. Once again, this may indicate either a financial problem in not being able to pay test

graders, or a poorly organized or understaffed student services department.

- dissatisfaction with the course. This could indicate a violation of the Business Standards of the Commission, poor control of sales representatives, or an institution that is engaging in misleading promotional practices.

- dissatisfaction with the job prospects after completing the course. This could indicate that the course is either out of date or incomplete. The institution may have a curriculum problem.

On the day of the on-site visit you will be given a list—if any—of student complaints received by the Commission's staff. As with the student surveys, use them to help frame your interviews for the day and to help you select the information you want to verify. The student complaints may point the way to other problems at the institution.

- **The Subject Specialist's Report(s)**

(Before studying this section review Appendix J. 4, "Guidelines for Subject Specialist Evaluators" in the *DETC Accreditation Handbook.*)

The subject specialist is the Commission's independent evaluator of the curriculum offered by the institution. Normally, every course is evaluated by a specialist who is an expert in a particular field. The exceptions are the institutions with many courses and the military institutions. Here, subject specialists visit the institutions with the on-site Committee and evaluate the courses. Briefly, what the subject specialists are looking for are the following:

- Is the course complete—that is, does it adequately cover the topic the advertising says it covers?

- Are the materials accurate?
- Do the exams adequately measure learning?
- Is the material up to date?
- Is the course sufficiently comprehensive to cover the stated outcomes?
- Does the course meet all of the published standards of the Commission?

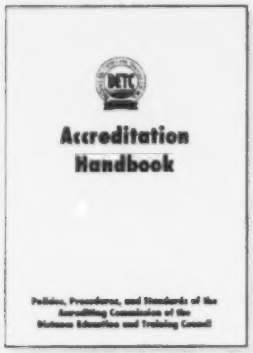
The types of people selected as subject specialists are individuals who are practitioners in their field or instructors from institutions of higher education. The subject matter experts receive the entire course, including any kits, tests and answer keys. Their main question is, "Does this course material meet the standards as set forth by the Commission for distance learning courses?"

As the on-site evaluator, the reports of the subject specialists are important to you because they will indicate whether the institution offers a quality, worthwhile program that meets the standards of the Commission. To the institution, the subject specialists' reports provide suggestions and comments on missing information, or offer suggestions on how to develop or update the course in the future.

The subject specialists' reports frequently offer guidance to the on-site evaluation team. When appropriate, subject specialists are asked to compare distance education courses to similar courses offered at traditional institutions. If the specialist's report indicates that the course is very "light" in content, then the educational standards evaluator may want to question the chief education official about this and look carefully at the course content. If the specialist's report indicates that the course is not up to date, then the educational standards evaluator may want to look carefully

through the letters from students and verify customer satisfaction and look over information on job placement. The usefulness of the subject specialist's report cannot be underestimated. It offers an independent expert's view of the curriculum.

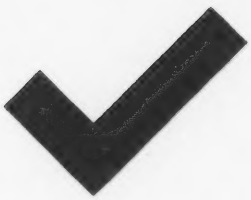
Handbook Reading Assignment



Time to get out your green book again. Consult your *DETC Accreditation Handbook* and review the following:

- Appendix H. 3—"Policy on Complaints"
- Appendix J. 3—"Standards of Ethics for Accreditation Participants"
- Appendix J. 5—"A Special Message to Evaluators of the Confidentiality of DETC Accreditation"
- Appendix J. 7—"Guidelines for the On-Site Visit"

Session Three — Quiz



This is your third self-check quiz in this course. We hope you will take the quiz to check your comprehension of what has been presented. Correct responses to the quiz are provided at the end of this session.

Instructions

Select the correct answer below the statement or question.

1. Which of the following is **not** a normal reason why someone becomes an evaluator for the Accrediting Commission?

   a. the money

b. the stimulation of reviewing one's peers

c. a professional obligation to give back something to education

d. a desire to protect the public and students

2. For the evaluator, the single most important document in preparing for any school visit is the:

a. *DETC Directory of Accredited Institutions*

b. Chair's Report

c. Examination Schedule

d. SER of the institution

3. Which of the following is an **incorrect statement** about the duties of an evaluator?

a. After the school visit, the evaluator should destroy all notes about the site visit

b. It is acceptable to tell school personnel, after the visit, how you believe the Commission will vote on their accreditation application

c. You must spend sufficient time with school personnel, but not so much time that you neglect the other staff members you are assigned to interview

d. You should always verify the information in the SER

4. Which of the following is a **correct** statement?

a. It is recommended that evaluators interview as many staff as possible on the introductory tour of the institution

b. Experienced evaluators may skip the executive breakfast or lunch sessions

c. Evaluators should write their report on the institution evaluation as soon as possible after the visit

d. It is helpful to compete the rating forms in ink as the evaluator reads the SER for the first time

5. An evaluator in the following situation should contact the Commission staff to determine if he or she should serve on the evaluation team.

   a. being a social friend of the president of the institution under review

   b. being employed by a school that has some of the same courses as the institution under review

   c. being "part-owner" due to having money in a mutual fund that also owns stock in the institution under review

   d. all of the above

Summary of Session Three

The best evaluators need to **see things for themselves.** Good evaluators combine the probing skills of a police detective with the listening skills of a polished diplomat. Above all, top evaluators treat others as they would like to be treated.

Failure to submit your report on time to your Committee Chair is a fatal act. It will ensure that you will most likely **not** be called to serve again. If, for any reason, you believe that you may not have the time to commit to serving on a Committee, it is best for all that you decline when first invited to serve. The staff understands and respects this decision by a professional.

To maintain and preserve the high degree of credibility attached to DETC accreditation, participants in the process should avoid conflicts of financial self-interest, be impartial, and keep the entire process confidential. **Remember, the best policy is that, when there is an appearance of a conflict, there is a conflict.**

Evaluators also review student surveys, subject specialists' reports, and student complaints in preparing for the on-site visit. All of these are reviewed by the Commission when an applicant is being considered for accreditation.

Correct Answers to Session Three Quiz

1. a — Most evaluators participate in the peer review for reasons other than money.

2. d — The key document to use before the evaluation is the SER. The institution is judged by what it says in the SER.

3. b — The evaluator **may never** predict what actions the Commission may take concerning any institution.

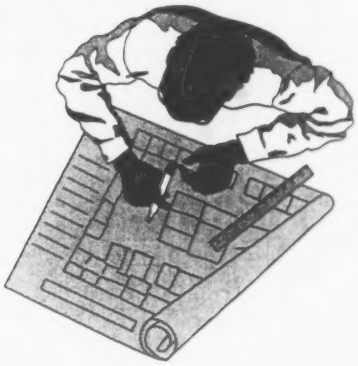
4. c — The evaluator should write the report to the Committee Chair **as soon as possible** after the evaluation, while the information is still fresh.

5. d — All three could be potential conflicts of interest in an evaluation. However, the most important is having a financial self-interest in the outcome of the evaluation, even if that self-interest appears to be relatively small.

Session Four

The Self-Evaluation Report

In this session you will review the Self-Evaluation Report, which is usually referred to as the "SER." The SER is the key document in your review of the institution. It is the "fitness report" providing much of the information you and your team will use to decide what questions to ask during the on-site visit.



The presentation of material in the SER follows the Commission's blueprint—the material should always be found in the same order.

The SER is written by the institution in response to more than 200 questions. It is designed to encourage the institution to tell the complete and honest story about itself. In practice, the SER should fully brief you about the institution. Then, during your school visit, you can verify the information contained in the document.

The Purposes of the SER

The SER has three principal purposes:

1. it provides a format and a rationale for conducting a critical self-study;

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2. it gives the examining committee the information and background material necessary to evaluate an institution against the Commission's standards; and

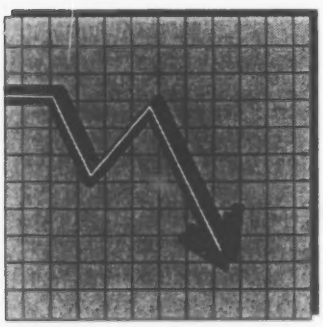
3. it is a benchmark document for the institution's internal planning, staff training, and external relations.

A fully developed, genuinely analytical, and honestly presented SER helps not only the evaluation team, but it also aids the institution in determining its strengths and identifying points where additional work must be done. It is a forward-looking strategic planning document.

The SER is the initial reference document for the Examining Committee. After your evaluation is completed, the SER's utility becomes secondary to the Chair's Report, which then becomes the document of record about the institution. The Commission reads and acts on the **Chair's Report,** not the SER.

Developing the SER

The development of the SER is done in such a way that all DETC accreditation standards are covered in the document. Appropriate supplemental exhibits and other documents are also included. For a complete explanation on preparing the SER, see Appendix A in the *DETC Accreditation Handbook*. When developing the SER, it should be thought of as not only a tool for management but also as a tool for evaluation.



By completing the SER the institution can often identify areas in which it can reduce costs and improve student services.

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The SER as a Management Tool

The SER can be used by the institution's management as a:

- **Training Tool**

  When the institution hires new staff members, the SER can be used as a key part in the new employee orientation process. Because the SER is detailed, it helps all employees gain an understanding about the institution and how its standard operating procedures work.

- **Record of an Institution's History**

  Institutions grow and change over time, and as senior staff members leave the institution, the "corporate history" of the institution can be lost. By looking back at prior SERs, the institution can maintain its history and identity in the distance education field.

- **Strategic Planning Document**

  To survive in today's competitive environment, every business or institution has to understand the present, project the future, and prepare for all possibilities. The SER helps the school identify its **W**eaknesses, **O**pportunities, **T**hreats, and **S**trengths. The analyses of the "**WOTS**" help the institution understand its position today and prepare for the changing distance education field of tomorrow.

- **Analysis Tool**

  The well-researched SER can be used by the institution's senior staff to understand how various parts of the institution work together. The SER also can help the CEO or chief business officer to identify inefficiencies or processes that should be streamlined to reduce costs. All too often senior

management is too close to the trees to see the forest. The SER process makes it possible for top management to sit back and say, *"Does what we are doing make sense, and is it the best way of operating our institution?"*

- **Service Improvement Document**

  The SER requires the institution to look at its student services. It forces an answer to the question, *"Are we running the student services area in the best possible way?"* A well-developed SER alerts the institution to needed improvements to motivate students, maintain records, or increase completion rates.

- **Public Relations Tool**

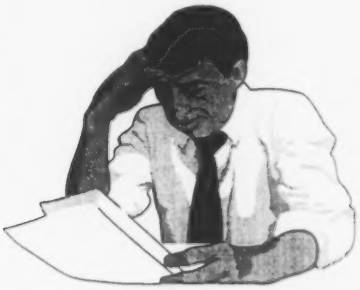
  The SER is similar to a "business plan" because it lays out, for all to see, what the realities are and what plans the school has for the future. Selected sections and exhibits from the SER can be used to prepare a business plan for banks or lenders. They can also be used as a public relations tool for board members or the media. The SER combines all information about the institution into one document that is easy to read and understand.

The SER as an Evaluation Tool

From your perspective as an evaluator, the SER is useful in the following ways:

- **As a Basic Information Document**

  As an examiner, the SER is your basic reference tool for the school visit. But remember, you must still verify the information contained in the SER while you are at the institution.



A careful reading of the SER will shed light on what the institution is doing.

- **Preliminary Completion of the Examiner's Rating Forms**

  The SER allows you to complete most of the "Examiner's Rating Form for All Institutions" (in pencil) before the visit. By doing this, it helps you to zero in on areas where you need additional information during the school visit.

- **Form an Opinion about the Institution Prior to the Visit**

  The SER gives you, the evaluator, a chance to form an opinion about the institution before you actually visit it. Sometimes this opinion may be negative. If that is what you believe, then you should attempt to prove or disprove your initial perception. In all cases, your job as an evaluator is to keep an open mind about the school and seek out the facts about the institution.

- **SERs Are Consistent in Format**

  Because the writing requirements of the SERs are standardized, once you are familiar with the layout of the SERs, then you can quickly go to any section for any institution. Good SERs should be written from a central author's point of view. They should be coherent and directly to the point.

Tips for Evaluators in Using the SER

We have found through experience that evaluators get the most out of the SER when they follow these tips:

1. **Safeguard the SER**

   The SER contains **confidential** information about the institution. Therefore, you must not share the information contained in it with anyone.

2. **Make the Report Your Own**

   SERs are designed to be written in, highlighted, and dismantled. As you read (and re-read) the SER, highlight or write on the pages. List any questions, comments, and items you want to verify. Make the SER a "living document" that you can quickly refer to during the on-site visit.

3. **Cannibalize the Report**

   After you have thoroughly read the report, "cannibalize" it. Take out the sections you need and make them transportable and easy to use. If the report is in a bulky binder, take it apart and put it in a smaller binder if you wish. Make the SER a useful tool for you!

4. **Share Your Thoughts about the SER with Your Fellow Committee Members**

   At the executive breakfast meeting, share any concerns or questions you have about the information contained in the SER. Let your Chair know what additional information you will need to complete your rating form.

5. **Comment on the Institution's SER**

   When the institution has done an especially good job of devel-

oping an SER, be sure to comment on it during your visit. Giving school staff some positive feedback on the quality of their SER does not breach the confidentiality of the decision making of the Commission. Having a well-written SER does not necessarily mean, however, the institution will be accredited by the Commission.

6. **Destroy the SER and Your Notes**

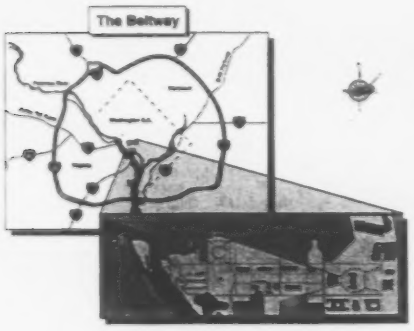
   Once the Commission staff notifies you that your report has been received, you must destroy the SER and all of your notes. In addition, you should also destroy any extra copies of your rating form, summary sheet, and comments. Remember, the SER and your notes are **confidential** documents, and they serve no other purpose except to help you in writing your evaluation report.

The SER is a starting point for your inquiries, albeit an important one, but it is just that. As an evaluator you must use your eyes, ears, and mind to complete your rating form and your report.

Items Found in Most SERs

When you review an institution's SER, you should look for the following items:

- **Maps**



Institutions are asked to provide maps to the institution's location from the hotel where the committee is staying and the nearest airport. If you are driving to the site, the maps should help you to find the location. Nothing is worse than becoming lost trying to find a school!

- **School Organizational Chart**

  Each institution is asked to include an organizational chart of its structure. Who reports to whom in the institution? Use this chart to help you decide who you will need to interview during the on-site visit. In addition, the chart should also help you to compare and contrast this structure to other distance learning institutions.

- **Annual Financial Statements**

  Institutions are asked to provide statements from the two most recent fiscal years. These need not be "audited," but must be prepared in accordance with generally accepted accounting procedures. They should be complete in all respects and include all explanatory notes. Read these confidential statements carefully before your visit.

- **Enrollment Contract or Agreement**

  The enrollment contract, application, or agreement the institution uses will be included in the SER. Look it over and determine if it meets the standards of the Commission. The state regulator—if present—can help determine if the contract meets the requirements of the state in which the institution is located.

- **School Catalog**

  The current institution catalog will be part of the SER documents. Read it carefully and compare it to the Commission's Business Standards (Appendix F in the *DETC Accreditation Handbook*). Do the catalog descriptions match what you see at the institution in the areas of course materials and services?

- **Advertisements and Promotional Literature**

  Copies of all of the institution's advertisements and promotional literature will be included with the SER. Decide if they meet the Commission's Business Standards and other requirements for published material.

- **Information on Each Distance Education Course Offered**

  The SER must provide information about each distance education course the institution offers and how well students are proceeding through each course. Review the answer to number 7 in Appendix A, "Institutional Summary Profile" in the *DETC Accreditation Handbook*.

- **Information on the Faculty**

  The SER must include information about the faculty and their qualifications. Review Appendix A, "Guide to Self-Evaluation Report," VI. Qualifications of Principals, Faculty and Staff, C and D, in the *DETC Accreditation Handbook*.

- **Student Outcomes Information**

  For each program, the institution must provide course or program outcomes data. For example, are students who are trained for a particular career or job actually finding jobs in that career or job area? Review Appendix A, "Guide to Self-Evaluation Report," IV. Student Services, C. 7, in the *DETC Accreditation Handbook*, for the information the institution must present on student outcomes.

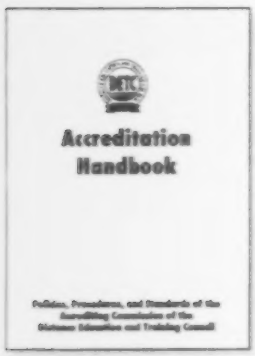
- **Future Plans**

  What are the future plans for the institution? Is the institution expecting to enroll more or fewer students next year?

Will the institution be offering new distance education courses, or will they be eliminating a current program. Does the institution have a written long-range plan for growth? These types of information also should be found in the SER under Section XII.

Reviewing these items when you read the SER can help to make the on-site visit more meaningful.

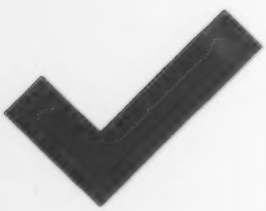
Handbook Reading Assignment



There are several other guides that are used when preparing reports to the Commission. Get our your green book and reread Appendix A, "Guide to Self-Evaluation Report" and "Institutional Summary Profile." Also read the guides in Appendix B, "Other Guides to Self-Evaluation," so you will be familiar with them.

Another important document is "Tips for Accrediting Commission Evaluators" found in Appendix J. 2.

Session Four — Quiz



This is your fourth self-check quiz. We hope you will take the quiz to check your comprehension of what has been presented. Correct responses to the quiz are provided at the end of this session.

Instructions

Select the correct answer below the statement or question.

1. Of the following, which is **not a major purpose** of the SER?

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a. It is a benchmark document useful in the institution's own planning and training efforts.

b. It gives the evaluation committee needed information about the institution.

c. It provides the rationale for conducting the critical self-study of the institution.

d. It provides state regulators with data to license the institution.

2. Which statement below is correct?

a. It is **not** appropriate for the evaluator to use the SER to form an opinion about the institution before the visit. The evaluator should wait until the school visit before making any judgments.

b. It is **appropriate** for the evaluator to use the SER to make preliminary judgments about the institution and to verify those judgments during the on-site visit.

c. The evaluator must use the SER to make final and unchangeable opinions about the institution before the visit.

3. Which statement is true?

a. The SER is the property of the institution and may not be defaced by the evaluator in any way.

b. The SER is a tool for the evaluator and may be written on and taken apart at the discretion of the evaluator.

c. The SER is a tool for the evaluator and may be written on and taken apart at the discretion of the evaluator, so long as it can be put together before it is **returned to the institution** after the site visit

4. Of the following, which is **not** normally found in SERs?

   a. Annual financial statements

   b. Enrollment agreements

   c. Bank deposit receipts

   d. School organization charts

Summary of Session Four

For the evaluator going to an institution, the hard work of the visitation begins when you receive a copy of the Self-Evaluation Report. This Report is a vital link in the peer review process and ties the statements of the school to the realities of the situation verified during the visit. The SER is your tool to use during the visit. When you are finished with your report it must be destroyed, thereby maintaining the confidentiality of the peer review process.

Correct Answers to Session Four Quiz

1. d — The SER is **not** normally used by state governments to review the institution. While state regulators may participate in the on-site visit, they base their licensing decisions on their own documents.

2. b — The evaluator should use the SER to make preliminary decisions about the quality of the institution and then verify or change those decisions based on the site visit.

3. b — The evaluator should first read the entire SER before taking it apart, but the SER is designed for the use of the evaluator. You may make the SER work for you.

4. c — Bank deposit receipts are not normally found in the SER.

Session Five

The Educational Standards Evaluator

In this session you will learn about the duties and responsibilities of the educational standards evaluator. Even if you aren't asked to serve as an educational standards evaluator, you should be familiar with this section. As a member of a peer review team, you must understand what the entire team will do on-site.

The educational standards evaluator interviews a school staff member in a one-on-one session.

If you have not yet reviewed Appendix D. 1, "Examiner's Rating Form for All Institutions," of the *DETC Accreditation Handbook*, you will want to have it available as you proceed through the next sessions.

Tasks of the Educational Standards Evaluator

As the educational standards evaluator it is important that you understand and complete the following tasks:

1. Understand the Current Accreditation Standards and Reports

The first step is the most basic—understand the current accreditation standards and reports of the Commission.

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Because the Commission updates its standards from time to time, it is necessary for you to be current with the standard in force today. Even if you are a veteran evaluator, it is recommended that you review the standards and policies **each time** you participate in an on-site visit.

In preparing for the school on-site visit as the educational standards evaluator, you should review the:

1. educational standards, forms, reports, and special policies in the *DETC Accreditation Handbook*; and
2. the requirements and responses concerning educational materials and services that should be included in the SER.

If you review this material within one week of the on-site visit, it will be fresh in your mind. It will make your evaluation more useful. If you have any questions concerning any form, policy, etc., contact the Commission staff before the visit.

2. Read the SER Completely

Reading the SER, while time consuming, is the logical first step for the dedicated evaluator. One evaluator once told the Commission staff that he managed to read the entire SER and pencil in his rating form while on the 60-minute plane ride to the institution. Unfortunately, this evaluator missed too many important points on the evaluation and has not been asked on a visit since then.

Reading a 100-200 page SER is a tall order, but with practice you can read it a few times and understand a great deal about the institution you will be evaluating. Here are a few tips for the new educational standards evaluator:

a. The first time you read the SER, read it for general content awareness. How does the editor address each

point? What is the writing style—clear and concise, or confused and disorganized? If the SER is not properly written, your job becomes harder, and you have to spend vital time hunting for information.

b. After the initial reading, read the SER a second time. This time look closely at questions revolving around the educational offerings of the institution. Have your rating form in front of you to refer to as you read. Are the responses complete? If they are incomplete, just how much information must you search for? Have a highlighter handy so you can highlight the references to the appendices, then read the appendices to see that the information is presented as promised.

c. At this point you should be able to answer the following questions:

> What is the institution's mission statement?
> Who are viewed by the institution as the key players?
> Who is the education director of the institution?
> Who is in charge of student services?
> What courses are being offered?
> Is this institution offering courses of obvious educational value?

d. If you cannot answer these questions, then you need to keep reading the SER, perhaps as many as four times. Keep highlighting material until you believe you have as many answers as possible. Remember, you may not find the answer in the SER. If not, then list the missing information on a sheet of paper so you can share this information with the examining committee. Do **not** contact the institution about any missing information. Go through the Commission staff to get additional materials before the date of the on-site visit.

Also, you can list what you like and do not like about the SER.

e. When getting ready for the on-site visit decide what you need to bring with you. In most cases you do not need the entire SER. The school will have a copy available for your use during the evaluation. However, you should bring any items from the SER on which you have written notes.

3. Prepare before the Visit

So, you are ready to catch your plane, and you are wondering what to do next. We have a few suggestions to help you have a profitable meeting:

a. Bring the school's organization chart along with you. On the chart, or on another sheet of paper, list the name of the person you want to see, and what questions and points you want to make when you talk to him or her. As you get answers to your questions, note them on your sheet. This way you always know what questions you still need to ask and what answers have already been given.

b. Read the comments of the off-site subject specialists about the curriculum offered by the institution. (Normally, you will receive these reports from the Commission's staff before the on-site visit.) What can you learn from their comments? What follow-up questions do you want to ask about the curriculum? List these on a sheet of paper along with the name or title of the individual who can probably answer your questions.

c. Read the responses from the students to the DETC survey. (Normally, you will receive these before the visit.) What do they tell you about the school, its curriculum, and student services? What follow-up questions do you want to ask during the on-site visit?

4. The On-Site Visit

Okay, it's the big day—your first (or 10th) evaluation trip. You've had your executive breakfast meeting and you're at the institution. You've finished the tour and you're ready to start interviewing. The school, its staff, and facilities are—or should be—gleaming. It is, after all, their day to impress you. **Remember, you are representing the Accrediting Commission, not yourself or your own institution, on this visit.** It is your task to find out if the institution is as great as they say it is in their SER.

You should be "business friendly" on the visit, but not too friendly! You are not a paid consultant. You are the evaluator who is there to see if the institution meets each of the standards. It is your job, as educational standards evaluator, to verify that the educational offerings of the institution are worthy of accreditation by the Commission. During the on-site visit, keep your opinions to yourself, and only share them with the other evaluation team members. **Do not** share your opinions with any of the institution's staff.

When meeting with several key school personnel, there are some routine questions you will want to ask. The following sample questions are broken down by the title of the individual you will be interviewing.

Questions for the Education Director

In addition to the questions asked in the rating form, here are some more for the Education Director.

Questions	Possible Responses
• How are the students doing? Are students completing the course? What is wrong, and what is being done about it?	> Doing fine, completion rate is ___%. Not doing fine. Examinations are too difficult. Questions are being revised.
• What is the revision schedule for the courses? What is the last time a course was revised? How much of it was revised at that time?	> Revision schedule is every ____ years. Last course revision occurred in ____. Of the original course, __% was revised.
• Who authors your courses? Are they under contract, freelance, or consultants?	> Courses are authored by _____. They are _____ to the school.
• Who owns the publishing rights to the courses? How much is paid for each course you sell, and how much is paid if the student completes the course?	> Courses are owned by _____. They are paid $_____ for every enrollment and $_____ for every program completion.
• What are your plans for new courses? Are any courses currently under development? When do you expect them to be completed?	> Our new courses are planned for ____ are in _____. We have the following courses under development: _____. We expect to have them completed in ____.
• How are instructors made available to the students who enroll in your courses? What hours are they available? What happens if the instructor can not answer the student's question?	> Instructors are made available by:_____. They are available from ___ to ___ daily/7 days a week, etc. If the instructor cannot answer a question the following occurs: _____.
• Because continuing education is important, how are you, as the education director, continuing your professional education? What were the last courses you took? When? What did you learn that you applied to the school's curriculum?	> Director's continuing education or professional education activities were: ____. The last courses taken were: ____. The director learned: _____ and applied it to the curriculum in the following ways:_____

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Questions for the Student Services Director

In addition to the questions asked in the rating form, here are some more for the Student Services Director.

Questions	Possible Responses
• How are exams graded? Who grades them? What is their background?	> Tests are graded by: hand/machine, computer, etc. They are graded by: _____, and their background is:____.
• How do you track the receipt of tests in the school from the day they arrive to the day that they are returned to the student?	> The exam tracking method is: _____. The average turnaround time for exams is _____ days.
• How do you track inquires from the student to the instructor? How long is the average inquiry turnaround time?	> Inquires are tracked by: _____. The average turnaround time is: _____.
• How does the evaluation staff provide references to correct and incorrect answers? When are academic questions on lesson assignments referred to subject specialists for review and comment?	> The staff provides correct answers to students by:_____. Academic questions on lesson assignments are referred to subject specialists for review and comment:_____.
• What is your record keeping process for student grades? How long after a test is it until the student record is updated?	> The record keeping process is: _____. Student records are updated: _____.
• If you use outside graders, how do you control their accuracy? Do you double check a percentage of their tests? If so, how often do you do it, and what percentage of the tests are reviewed for accuracy in grading?	> Outside graders are controlled and monitored by: _____. A ____ percentage of all tests are checked on the following schedule: _____.
• What is your policy on failed examinations? How often can a student retake an exam? How are the grades earned in retake examinations treated?	> The policy on failed exams is: _____. Grades earned in retakes are treated: _____.

Questions	Possible Responses
• What is your policy on academic failures? Can students re-register for the course? If so, what is the cost?	> Academic failure policy is: _____. Students can retake the course for $_____.

- I would like to talk to the following:
  - > instructors/faculty
  - > graders
  - > course writers

- I want to see the following types of files:
  - > currently enrolled students
  - > graduated students
  - > failed students

Questions for the Registrar/Admissions Person

In addition to the questions asked in the rating form, here are some more for the Registrar/Admissions Person.

Questions	Possible Responses
• What standards must a student meet to be accepted into this (these) program(s)? How do you handle students who apply, but do not currently meet the admissions standard?	> The standards for admission are: _____. A potential student, not meeting these standards, must do: _____.
• Does the Education Director have a role in the admissions process? If so, what is it?	> Education Director's role is: _____.
• What separation is there between marketing, admissions, and student services at this school?	> The separation is: _____.
• As the registrar, to whom do you report?	> The registrar reports to: _____.

Questions for the School President or CEO

In addition to the questions asked in the rating form, here are some more for the School President or CEO.

Questions	Possible Responses
• Are the current school operations growing, static, or shrinking? What are your enrollment targets for this year? How far along are you in meeting those targets?	> Institution is: _____. Enrollment targets for this year are: _____. The institution is: _____ in meeting those targets.
• How stable is your staff/faculty? Are any staff/faculty expected to leave in the next six months/year? How many open staff/faculty positions do you currently have? When will they be filled?	> Staff/faculty is: _____. Staff/faculty expected to leave soon are: ___ in number. Institution has ____ open positions. We expect them to be filled by: _____.
• What is the future that you see for this institution? What plans do you have to make that future a reality? How will you know if you are successful?	> The institution's future is: _____. Implementation plans are: _____. Success is defined as: ___.
• Are contracts with the faculty up-to-date and clearly written? Are rewards and remunerations clearly stated and administered promptly?	> Yes, our contracts with faculty are up-to-date and rewards and remunerations are clearly stated and administered as seen: _____
• What major changes and improvements has your institution made over the last five years?	> Institution has made the following changes and improvements over the last five years: _____.
• What did you learn from the SER process? What actions have you taken based on the SER process?	> Institution learned ____ from the SER process and took _____ actions.
• What do you see as the major strengths and weaknesses of your institution?	> In my opinion, the institution's major strengths are:_____ and weaknesses are:_____.

Questions for Other Staff/Faculty Members

In addition to the questions asked in the rating form, here are some more for other staff/faculty members.

Questions	Possible Responses
For the Course Writers:	
• What is the schedule for updating courses? How far along are you in updating the course you are working on? When will you be finished? What happens next? When will the course be published and in the hands of students?	> Schedule for updating courses is: _____. Writer is ____ percent through current update. Course will be finished by: _____, published on: ____, and in the hands of students by _____.
For the Faculty:	
• What is your involvement in exam grading, telephone consultation with students, academic counseling, course revision, development of study guides, and supervision of course writers?	> Faculty's involvement in these areas are:_____.
For the Graphics & Copy Editor:	
• How do you insert graphics in your courses? Who approves copy changes, pictures, etc., for the courses? Where do your graphics pictures come from? Who edits copy before it is printed?	> Graphics and copy are prepared in: _____. Approval requires the sign-off of: _____. Graphics come from: _____. Pre-printing editing is done by: _____.
For the Mail Room & Shipping Staff:	
• What is your procedure for assembling lessons to send to students? How do you ship materials? How do you track lost shipments? How many day's supply of lessons 1 through 3 do you have on hand right now?	> Lessons are assembled by: _____. Lessons are shipped by: _____. School tracks lost lessons by: _____. School has ____ day's supply of lessons 1, 2 &3.
For the Test Graders:	
• How many tests do you grade a day/week? Who verifies the accuracy of your grading? How are inquiries from students about a graded test item handled?	> Grades ____ tests per day/week. Accuracy of grading is verified by: _____. Student inquiries are handled by: _____.

As you ask these questions of the school's staff, always remember the information you need to complete your report. Use your rating form to remind you what questions to ask when you interview school staff and faculty. In addition, budget your time so you do not spend too much time with any one staff member. Always ask early in the conversation for any information that was missing from the SER or for any reports that may be needed. This will give the staff member time to ask someone to get the needed report or information.

After your on-site visit, while you are waiting for your plane, or certainly the next day, take an hour or so to make notes about what you saw during the visit. Always staple your notes together—paper clips have a tendency to pull out, and you can lose your important papers. Keep everything together until you have written your report.

5. Completing Your Rating Form

Okay, it's "show time"—time to complete your rating form! Get the SER, your penciled in rating form, and your notes from the visit. Find a quiet and comfortable place, and **let's get on with it!**

- Start with reviewing all of your penciled sections of the rating form.

- Have you changed your mind about what you originally wrote there? If so, how and why? Did the visit just confirm what you originally wrote?

- If you cannot make or give an opinion on a specific Commission standard, then explain this section carefully. Put in writing why you can't give an opinion.

- What can the institution do to operate better, or to provide better service to students? Write these sugges-

tions down for your Chair to use when he or she writes the final report.

Normally, the Chair of your committee needs your rating form and commentary within two weeks of the site visit. Please be prompt—a deadline is just that—a date by which your report must be in the hands of your Committee Chair. In mailing your report, use one of the express shipping services (e.g., FedEx or UPS) if you are running close to your deadline.

Tips for the Educational Standards Evaluator

Over the years previous educational standards evaluators have found these questions often jog their memory and help evaluate the institution more suitably:

1. Why does this institution exist? What is it trying to do, and is it accomplishing it? Can it document that it is meeting its goals?
2. If the school has entry or admissions standards (tests, etc.), are they being followed?
3. How does the staff of the institution "feel" about the institution and their jobs? Are they committed to quality education?
4. Does school staff appear to care if every student graduates? Do they realistically try to get slow-starters to complete the entire course?
5. When new courses are being developed, does the institution have a method of involving the instructor, students, and subject matter experts in the development process?
6. Does the institution conduct legitimate and effective student satisfaction surveys? Did you see any "bad" results during a review of these files? If so, what did the institution do about

the negative comments it received from the students? Are surveys designed to produce only "happy" data?

7. Just how easy does the institution make it for the student to talk to an instructor?

8. Are the instructors current in their fields?

9. Are school employees encouraged to take the courses themselves?

Decisions on accreditation are made on balance—does the school provide quality education based on the Commission's standards?

10. Are appropriate technologies being used to enhance student learning?

11. From what you have observed, are there sufficient checks and balances to ensure academic integrity between the various departments within the institution? Does the marketing department exercise undue control over the educational department?

12. Does the training or education actually prepare the students for the jobs that the institution advertises?

13. Does the education director have a genuine say in what the advertising says about the course outcomes and coverage?

14. If you were a student, could you understand exactly what the goals and objectives of the course are, and how you could use them?

The Circle of Excellence

Institutions wanting to become better—which should include every applicant for DETC accreditation—increase their chance of success when they adopt something similar to the ***Circle of Excellence***. This interactive tool helps institutions make planning and implementation decisions based on constant feedback.

The Circle of Excellence

Interview Questions

The statements you use in your one-on-one interviews with school staff will help you gather useful information. There are two basic styles of interview questions that are useful in information gathering: the open-ended or leading statement and the closed-ended statement. Knowing how to use both types will make your interviews more productive.

Open-Ended Statements

An open-ended statement is useful in allowing an individual to describe something or to answer a question in his or her own words. The open-ended statement allows the person to speak freely, thus providing more information for further follow-up. Samples of open-ended questions evaluators have used are:

- "Tell me how you verify that your graders are correctly scoring the lessons?"

- "How do you handle student complaints?"

- "Describe your course revision process in detail."

An open-ended statement does not have to be in the form of a question. It can be a simple statement that allows freedom of discussion. Use open-ended statements to stimulate the school staff to talk to you.

The correct type of statement or question helps the evaluator get to the bottom of the topic.

Closed-Ended Statements

The closed-ended statement is useful in verifying specific data presented in the SER. It expects either a negative or positive response, or it forces the individual to explain what was meant by an earlier statement. Some examples of closed-ended statements are:

- "I see by your catalog that you offer a 100% refund if the student drops the course within the first 30 days. Can you show me examples?"

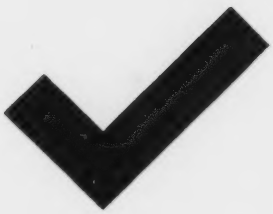
- "From your last statement, I understand the institution requires that all students must pass a reading test before enrollment. Please show me where I may verify this."

- "Why is your non-start rate so high in your accounting course?"

Closed-ended statements can help you to verify information. They are useful in detecting differences between what the institution says it does, and what it does in reality.

Use both of these techniques in your interviews—they both work, but for different reasons.

Session Five — Quiz



It's time to take another self-check quiz. As with the other quizzes, this is optional. But look, after all the fun of reading this information, go ahead and take the quiz. It will show you just how much you know about being an educational standards evaluator!

Instructions

Select the correct answer below the statement or question.

1. When you review the SER, which of the following is **not** normally found in this document?

   a. courses offered
   b. DETC student survey results
   c. name of the education director
   d. school mission statement

2. The person who reviews courses usually at home is called a:

   a. curriculum consultant
   b. business evaluator

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c. materials reviewer

d. subject specialist

3. During the on-site visit, the educational standards evaluator should feel free to offer advice on the curriculum and student services operations.

   a. True, so long as the evaluator has expertise in these areas.

   b. True, so long as the evaluator clearly states that he or she is only talking for themselves, not for the Commission.

   c. False, evaluators may never give advice during the on-site visit.

4. In order to **verify** admissions information, grades earned, and other student-related material, which is the best source of information?

   a. education director

   b. graders

   c. school president

   d. student files

5. Which is probably the most common method that institutions can use to verify customer satisfaction?

   a. focus group discussions

   b. pre-admission questionnaires

   c. mail-in student surveys

   d. phone calls from students

6. Select the example of an open-ended question.

   a. "Describe for me your verification process for admitting students."

   b. "Is it correct that you only admit students who have a high school diploma or GED?"

   c. "How many students do you enroll?"

Summary of Session Five

Being an educational standards evaluator is similar to being a detective—you must take action based on prescribed or limited information, seek the truth by observation and questioning, and then make a decision on whether or not the institution meets each of the standards you have been assigned to evaluate. The questions that you ask, how you ask them, and how you phrase follow-up questions can contribute to your understanding of the institution. By using both open-ended and closed-ended questions you can get the information you need to know about the institution.

Correct Answers to Session Five Quiz

1. b — Normally the student survey results gathered by the DETC are not found as part of the SER. They are either sent to evaluators or are available on-site.

2. d — The subject specialist reviews the curriculum normally at home.

3. c — Evaluators are never to give advice during the on-site visit.

4. d — The best source to verify student information is found in the student files.

5. c — The most common way an institution has to determine customer satisfaction is through mailed-in student surveys—either by a 100% survey or a random survey of all enrolled students.

6. a — The open-ended statement allows the person to describe something in detail.

Sample of Remarks Taken from an Educational Standards Evaluator's Report under II. Educational Materials

D. Reading Level **Meets Standard II. D. Overall: Yes**

XYZ's successful commitment to presenting readable course materials is illustrated by the results of Flesch-Kincaid analyses on each course assignment. Required reading levels, ranging from 6th through 10th grade, are well within enrollment requirements and the promises made in ads.

E. Study Instructions **Meets Standard II. E. Overall: Yes**

The courses provide excellent instructions and helpful guidelines for effective learning.

F. Organization of Instructional Materials **Meets Standard II. F. Overall: Yes**

Course organization and presentation is logical. Instructors are provided with a number of assignments and projects (in applicable courses) to effectively evaluate student comprehension.

G. Teaching Devices **Meets Standard II. G. Overall: Yes**

The Institute employs several effective instructional tools: A unique program with high quality video tapes and excellent audio tapes. In addition, XYZ has implemented an online system, XYZ-Net, to provide additional resources to students.

H. Illustrations **Meets Standard II. H. Overall: No**

Most courses use illustrative photographs extensively. These photos are an effective instructional aid in the more current courses; less so in the older courses. For example, "XX Course" effectively illustrates many aspects of the subject taught with high quality photographs. Less current courses, ZZZ course, for example, do not fare as well. Poor reproduction of some color photographs work to the detriment and understanding of the associated text.

Recommendations

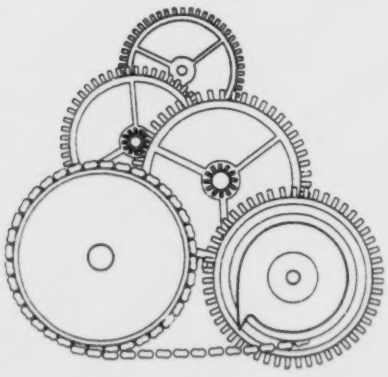
Inconsistency in photo reproduction quality appears to be mostly a result of age. The newer the course, the better and the more consistent the process. As older courses are revised and updated, this problem should disappear. XYZ is strongly encouraged to take a critical survey of all the illustrations which might be upgraded during the revision of older courses. The overall quality of the course materials will benefit.

Session Six

The Business Standards Evaluator

Welcome back! In this session we will be looking at the role of the business standards evaluator. This is the Commission's key person who will be comparing the standards on administrative competence, business ethics, financial stability, and organizational integrity to the realities of the institution. If you are serving as the business standards evaluator on an evaluation, you will be making numerous judgments about the institution's business practices. It will be your job to decide if the institution is:

- reputable and ethical in its dealings;
- observing the DETC Business Standards;
- well-managed and financially sound; and
- worthy of the public's confidence.



The DETC business standards evaluator is the cog that impacts the entire institution review.

The goal for this session is to help you to determine what you will be reviewing before and during the school visit. For those of you who may be assisting the Commission as an educational standards evaluator or subject specialist evaluator, this session will

give you background information on what your business standards evaluator colleague(s) will be doing. This is an important study session, because no matter how good the educational products an institution provides, if it is not financially sound, or if it engages in questionable marketing practices, then students and the public may be disadvantaged or damaged.

Get out your Handbook and refer to Section F, the DETC Business Standards, and pull out your "Examiner's Rating Form for All Institutions," in Appendix D. 1. Both of these will help you in follow the comments below and understand the responsibilities of the business standards evaluator.

What are the DETC Business Standards?

Most associations have certain voluntarily imposed standards of ethical practice that it expects its members to uphold. Social organizations have their standards, civic organizations expect you to volunteer for charitable projects they sponsor, and accrediting organizations, such as the DETC, have educational and business standards that its members must meet. Compliance with each of the standards is implicit. There is no implied level of noncompliance for any institution for any standard.

The DETC Business Standards are standards applicable to the business practices and policies of an institution in such areas as ethical practice in advertising and promotion, sales, tuition cancellation, and settlement policies.

As the business standards evaluator you might well be asking yourself, on behalf of the Commission, the following questions:

1. Does this institution operate with integrity and does it exhibit ethical behavior in all respects?

2. Does this institution deliver on its promises to it customers, the students? Can it document that it delivers on them?

3. Does the institution promote its offerings honestly and exercise care in dealing with its students?

In some instances, the answers to these questions may be "no." But, in other situations, the answers may not be quite so clear. This is where you need to research the institution's business practices. A business standards evaluator should have a healthy dose of skepticism when reviewing an institution. Often, poorly run institutions are easy to discover, but a well-meaning but poorly operated institution may be more challenging to judge. Remember the quotation from Wen D. Young:

> *It is not the crook in modern business that we fear but the honest man who does not know what he is doing.*

This is where the Commission's Business Standards will guide you in making your judgments about the institution's ability to meet each standard. For example, it is the business standards evaluator who will look at all of the financial information and make a judgment on the financial stability of the institution. Now, let's look at the specific tasks, duties, and responsibilities of the business standards evaluator.

The Tasks of the Business Standards Evaluator

So, you have been selected to represent the Commission as its business standards evaluator on an upcoming school visit. What are your tasks and how should you prepare? As with the educational standards evaluator, you start at the beginning.

1. Know and Understand the Business Standards

Before you begin to evaluate the financial worthiness of an institution, you must fully understand the Commission's Business Standards. Read them thoroughly before you read the SER and review them before the on-site visit. Here are some publications available from DETC that will help you:

a. The DETC Business Standards Course

This course, similar to the one you are now taking, is a distance learning course that helps you understand not only the standards themselves, but the history and reasons behind them.

b. DETC Occasional Papers 6 and 7

These occasional papers issued by the DETC are good background papers for the business standards evaluator. Paper 6 is entitled *Enrollment Contracts for Home Study Schools* and Paper 7 is entitled *Evaluating Your School's Worth.*

c. Home Study Advertising Handbook

This DETC handbook provides valuable "insider" guidance on accepted school advertising practices.

2. Read the Self-Evaluation Report Completely

Because the SER is your window on the institution, you must be sure to read the entire SER—not just the business standards sections. As recommended in the prior sessions, read the entire document through first without taking too many notes. How does the institution presents information? What type of writing style did they use? Overall, what do you think of the school's SER? Your first cursory reading should give you an overview of the institution. Let the substance of the SER come out in your subsequent readings. Read the Commission's Standards and the Business Standards just before you read the SER. This way the information will be fresh in your mind.

Your second reading should be in-depth. Now, use your rating form, and highlight and note the information you find in

the SER. How many answers can you write on the rating form (in pencil) from your second reading? Do the appendices contain all of the information they are supposed to contain? Is the financial information current, comprehensible, and complete?

The second (and yes, maybe a third or fourth reading of the SER) should tell you what you need to do to complete some of the rating form prior to the on-site visit.

3. Note What's Missing

With your rating form in front of you, figure out what is missing from the SER. For example, are complete copies of the school's advertisements included? Are sales manuals that are used by the institution's representatives included? Are all the required financial reports available?

4. Understand the Appropriate Accreditation Standards

The business standards evaluator **must** know the Commission's Business Standards inside and out! Be sure to read and re-read Accreditation Standards 7 through 12—the most important ones for your review. Contact the Commission's staff if you have questions on the accepted interpretations of these important standards. Note if any standards have been changed or deleted since your last school review.

5. Study All the Publications Prepared by the Institution

A careful combing through the publications prepared by the institution will give the business standards evaluator a good idea about the business ethics of the institution. For example, are the enrollment contracts clear and understandable, with all expected consumer protection clauses included? Or, are the institution's contracts unnecessarily vague? What

do the collection letters say to the student about the collection policies of the institution? By reading such publications **well before** the on-site visit, the business standards evaluator can form a mental image about the practices of the institution. Do some pre-visit sleuthing on your own and look for the school's advertisements in the media. If you find them, do they meet the standards of the Commission? Such pre-visit preparation will save you time and effort later.

The business standards evaluator must analyze word by word the promotional publications of the institution against the Standards.

6. Compile a List of Follow-Up Questions for the On-Site Visit

Put together a list of follow-up questions you want to ask when you are visiting the institution. Use your "missing information" list to start. Then add to the list any information that is unclear or contradictory. Lastly, add any follow-up questions that your multiple readings of the SER have suggested. For example:

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- Missing Information

  1. Tuition collection letter #3 is missing in a 7 letter series. Why?

  2. Standard school contract mentions a page titled, "*Your Rights As a Student*." It is not included. Why?

- Contradictory Information

  1. The SER text does not mention anything about being referred to a collection agency for nonpayment, yet Collection Letter #4 threatens that students will be turned over to an outside agency. Why the contradiction?

  2. The institution's refund policy as stated in the SER differs markedly from the one on the specimen contract. Why?

- Other Questions

  1. Inventory value on the balance sheet does not appear to be adequate to service all students. Why?

  2. The amount of the write-offs for uncollectible debts seems unreasonably low. How is the amount calculated?

By making this kind of list ahead of time, you can optimize your time with the staff on the day of the visit.

Key Focus Points

Over the years, business standards evaluators have identified a number of critical areas that seem to separate the top flight institutions from those in or headed for financial difficulty. The following list (in descending order) should aid in your review.

By looking at these areas of the business life of the institution, the business standards evaluator can get to the heart of the question, "Does this school meet the DETC Business Standards?" This is one of the main reasons for the on-site visit, and sometimes the most difficult question to answer!

Indicators of Institutional Integrity

1. What is the financial condition of the institution? Is the institution really financially sound? Has the institution been in operation for two years and does it pay its bills and other obligations on time?

2. Are the advertising and promotional pieces honest and ethical? Do the promises the institution makes to the student match the services it provides? Are all catalogs accurate and written in such a way that the average student could understand them?

3. Do the institution's refund policies match the ones required by the DETC? When refunds are given, are they calculated accurately? Are the refunds mailed to students within 30 days? When comparing the "endorsement date" on refund checks, do they appear close to the date on which the check was written or are they consistently several months apart? (This could indicate an institution was holding refunds even after the checks have been written.)

4. Are the written agreements with the sales representatives clear, stating all the rights and provisions of the institution and the sales representatives? How are student complaints about sales representatives handled? Are refunds given in disputes with sales representatives? What action is taken against any sales representative? Are there franchise arrangements? Is there a signed *Code of Ethics* on file for each representative?

5. Are the student contracts clear and written at a level that the average student enrolling in the school could understand? What is the admissions policy and is it enforced? How are exceptions to the admissions policy determined, and how many (what percentage) of all students fall under this exceptions policy?

6. Have there been any complaints to school officials, DETC, or state and federal agencies regarding sales representatives' actions?

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Approaching Your Tasks

How you approach the institution review helps you to organize your time before and during the on-site visit. Between 60 and 70 percent of the business standards evaluator's work can be done at home, before the on-site visit. This means that your work on-site can be focused on talking to as many people as possible to validate SER statements and/or to discover inconsistencies.

You do not have to flip a coin to assess the financial condition of the institution. Research and evaluation of key indicators will guide you to a valid assessment.

When you use the rating form while reading the SER, you can answer many questions (in pencil, please). More important, the answers you get may lead you into other useful lines of inquiry. For example, in checking the accounts receivable, you may note that the number of "enrolled" students does not match the income that is reported. A good evaluator will note this discrepancy on the "questions" form and seek an answer on the day of the on-site visit.

The business standards evaluator usually has to deal with more hard data and "cut and dried" facts than other reviewers. For example, the educational standards evaluator is looking at more subjective areas, such as student satisfaction and instructor qualifications. But, as the business standards evaluator, you are comparing the Commission's business standards to the institution's actual business practices. Either the institution

meets the standards or it does not meet them. Much of the evaluation done by the business standards evaluator is based on observable data and facts. Often, you still have to dig for some of the answers.

Have you, or any of your friends, had any experience with the institution's promotional or marketing practices? Did you "shop" the institution before the visit? If so, what type of information did you receive? Does it match the literature contained in the SER? Do advertisements in magazines and newspapers match the information contained in the SER? Have you visited the institution's home page on the World Wide Web? Have you requested a catalog via telephone?

These are just a few tips that can help you, the business standards evaluator, determine the ethical and management principles of the institution.

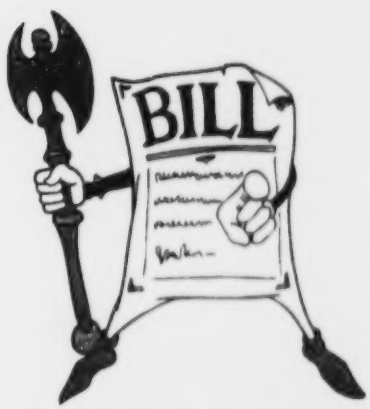
Review of the Examiner's Rating Form

Get out your copy of the *DETC Accreditation Handbook* and turn to Section D. 1, "Examiner's Rating Form for All Institutions." In this part of your session we will review "Standard IX. Financial Responsibility, A. Financial Practices." Let's look at some of the more important questions you will be researching. Items in parentheses indicate the actual question on the rating form. Where no item is cited, this is a generally accepted accounting test or measurement that should be useful in determining the financial condition of the institution.

You need to review the other financial sections of the rating form, looking at similar questions and indicators. Pay particular attention to "Standard XI. Plant and Equipment" and "Standard XII. Research and Self-Improvement." Safety of the facility and adequate protection and backup of student records is an important area of concern. "Research and Self-Improvement" is an area all evaluators should examine closely. Be inquisitive, ask more

Key Financial Indicators

1. Does the institution use the accrual method of accounting? (IX., A. 1.e.)*
2. When calulating a current asset/current liability ratio, does it indicate that the institution is solvent? (IX, A. 4.)
3. How does this institution handle its accounts receivable? Is this realistic? (Remember, while every institution is different, you should judge the way the institution handles its receivables account. Is this method realistic, and does it show an honest financial picture of the institution?)
4. When you review the accounts payable, how large is this amount? Are the accounts payable current, or do the amounts listed include many "past due" charges? (IX, A. 6.)
5. When you compare the "EBIT" (Earnings Before Income Taxes) from year to year, what does it show? Is the institution losing money?
6. If the school is growing, how is the institution financing that growth? Is the money coming from commercial lenders, sale of stock to investors, loans from officers, or profits from operations? What is the ratio of debt versus equity standing of the institution, and what does this tell you about the institution's financial health?
7. Does the school make a provision for unearned tuition on its balance sheet? Is it adequate? Have refunds been made within 30 days of a student notifying the institution? (IX.A.5.)
8. Are vendors being paid when the bills are due? For a good measure, check out the bills of the printers publishing the institution's course materials. (IX. A. 6.)
9. Are the expenses for advertising realistic given the projected enrollments for the institution? (Sometimes institutions cut advertising expenses in order to show bigger profits. This may indicate an institution heading for trouble.)
10. When you review the enrollment trends for the past two or three years, does it tell you that this is a financially healthy institution? What is the trend based on these years versus the enrollment that the institution is projecting for the current year?
11. If the institution is having financial losses, what is your guess on how long the institution can survive with the current loss rate? What is the institution doing to reduce and eliminate its losses? Are management's actions enough, and done soon enough, to be effective?



*See questions in Appendix D. 1 in the *DETC Accreditation Handbook*

An institution with too many past due bills may be a school headed for financial trouble.

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questions of a background nature, and be prepared to follow-up one question with another.

DO's and DON'Ts for the Business Standards Evaluator

The following are some do's and don'ts for the business standards evaluator.

- **DO** go beyond what the printed financial statement indicates about the institution. For example, if the inventory on a course indicates that there should be about 300 copies of Lesson 1, then go and look to see if there are about 300 copies of the lesson on the warehouse shelves. If there are not that many lessons, find out what happened to the difference. Or did the institution inflate the inventory to appear more solvent?

- **DO** study carefully the footnotes on the financial statements. Are they making many exceptions to the statements or indicating problems in management or other legal contingencies?

- **DO** talk to people such as the treasurer, registrar, bookkeeper, purchasing agent, refund clerk, disbursements clerk, etc., to determine any inconsistencies.

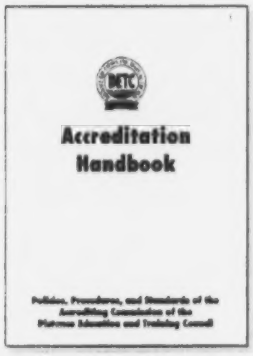
- **DO** interview the CEO and the chief financial officer for their assessment of the condition of the institution. Do they believe that the financial statements are true reflections of the financial strength of the school? If not, then what is the "truth?" What can they tell you that the "numbers" don't?

- **DON'T** take the financial statements at face value. Look into the records and see if the records validate the entries on the financial statement.

- **DON'T** assume that last year's financial records reflect what is happening today. Look at the latest monthly and year-to-date financials and see what they tell you about the institution. Remember, the financial information in the SER is "dated," so verify the financial strength of the institution based on what is happening on the day of the visit.

Treat your review of the institution's financial records as though you were personally going to invest in a company. Look at enough records to determine if you would invest your money in this institution. If you were a student, would it be safe for you to "invest" your enrollment dollars in this institution? If the answer is "no" to either of these questions, then perhaps this institution should not be accredited by the Commission.

Handbook Reading Assignment



Now, take out your Handbook and re-read Sections IV through XII of the "Examiner's Rating Form for All Institutions." Also read the following:

- Appendix F—"DETC Business Standards"
- Appendix H. 2—"Policy on Commission-Requested Financial Statements"

Now you are ready to take the quiz!

Session Six — Quiz

Congratulations! This is your sixth self-check quiz. Go ahead and take the quiz to check your comprehension of what has been presented. The correct responses to the quiz are provided at the end of this session.

Instructions

Select the correct answer for each statement or question.

1. One important question the **business standards evaluator** should answer is:

   a. Are the educational materials up-to-date?

   b. Does the institution give prompt exam service?

   c. Does the institution's refund policy meet the minimum DETC standards?

   d. Is the faculty qualified?

2. An unclear and confusing enrollment contract may mean:

   a. The state's laws are unnecessarily vague and designed to confuse students.

   b. The institution may be attempting to obscure the actual meaning of the contract.

   c. The institution has reviewed the DETC standards.

3. Match the evaluator in the left column with the school staff member in the right column as principal interview assignments for the evaluator:

Enter No. Col. 2	Evaluator	Staff
_____	a. business standards	1. Education Director
_____	b. educational standards	2. VP, Marketing
_____	c. Chair	3. Dir., Student Services
		4. Director, Collections
		5. All of the above

Summary of Session Six

As the business standards evaluator, it is your job not only to decide whether the institution has operated in a financially stable way in the past, but also to project whether the institution will likely be able to continue to operate in a stable and ethical manner. In the past, a few distance education institutions with apparently healthy balance sheets closed quickly. While some had unusual difficulties, others had a history of poor financial management. It is your job to compare the management philosophy of the institution to the realities of the marketing techniques they use. How much integrity does the institution exhibit in its dealings with the public? The financial statements are only a part of the story. You must dig out the rest of the facts from your knowledge of sound business practice. The Commission, the public, and students depend upon your judgment.

Correct Answers to Session Six Quiz

1. c — One important question for the business standards evaluator to check out thoroughly is whether the institution's refund policy meets the DETC standards.

2. b — A poorly written contract may mean that the institutions is attempting to "hide" the actual facts of the enrollment contract (assuming that the state does not specify the format of the enrollment agreement).

3. a — Business Standards Evaluator: 2 & 4

   b — Educational Standards Evaluator: 1 & 3

   c — Chair: 5

Analyzing Financial Statements

by Robin Scheiderman, CPA

In analyzing financial statements, it is always beneficial to have at least the two most current years available to determine trends and management strength. Most financial statements prepared by independent CPA's will show comparative statements. The DETC Occasional Paper *Evaluating Your School's Worth* provides an excellent discussion regarding the basic terms and concepts for evaluating a school's financial statements.

Balance Sheet

Current Ratio: (See page 121.) At first glance, La Tomate appears to have current assets in excess of current liabilities. However, with a closer look, the Institute's current assets include an unsecured loan to a shareholder at a low rate of interest with no stipulated repayment date (Footnote 7). Not a very liquid asset available to repay current liabilities! Also, there is only a minimal amount of actual cash and investments on hand relative to accounts payable and other accrued expenses. Well-run operations generate cash and have the ability to pay off debts. What's wrong at La Tomate?

Accounts Receivable and Inventory: The increase from one year to the next in these two items should equal approximately the sales growth in a healthy organization. La Tomate has experienced a 7% increase in Tuition Revenues. However, Accounts Receivable have increased 16%. A quick glance at Bad Debt Expense on the income statement shows that La Tomate has had only nominal write offs for the two years. Either they have the best-paying students of any school, or they don't write off bad accounts thereby inflating current assets and current revenues. However, Collections Expense is also extremely high. Maybe La Tomate has a too aggressive collection policy. Check their collection tactics to find out.

An important determination regarding Accounts Receivable is the accounting policy for earning revenues. Is it appropriate accrual accounting? Financial statements prepared by an independent CPA **should always contain a footnote outlining significant accounting principles applicable to the organization.** This should include a discussion of revenue recognition policies. Footnote 1 does not address this issue. La Tomate indicates that tuition revenues are recognized upon shipment of courses. This is not appropriate as it does not reflect the liability of the school in providing the related educational services. Schools should not earn the tuition any sooner than allowed by the school's applicable refund policy. This results in an overstatement of Accounts Receivable for La Tomate. La Tomate does show a Prepaid Tuition liability; however, as the dollar amount did not change between 1996 and 1997, there is a good chance that this amount is not being properly handled on the books.

Current Liabilities: La Tomate's current liabilities have increased dramatically from the previous year. A closer look shows a large increase in Salaries and Employee Benefits Payable as well as Taxes Payable. Looking through the Footnotes solves one of these issues. Footnote 3 indicates that the Institute has fallen behind in making payroll tax deposits. A very bad sign for the management of any organization! Footnote 4 provides a clue to the Employee Benefits question. The Institute has made sizable profit sharing/401(k) contributions for the past two years in spite of low earnings. A question to ask here and for the Salaries Payable is "Who are the main beneficiaries of these accruals?" Could it be just the owners?

Long-term Liabilities: This is always an indication of debt incurred by the organization. This is not necessarily bad. Debt is incurred for many reasons including financing of improved facilities/equipment for faculty and students or expanding operations through acquisitions. A look at La Tomate shows a large amount of Long-Term Debt. However, Property and Equipment has stayed the same and there is no indication of an acquisition or

expansion of operations for the Institute. Where did the money go? A bad sign is the Loan to Shareholders for $50,000. Did the Institute borrow money and turn around and loan it to its shareholders?

Income Statement

Net Income: (See page 120.) The obvious first item to look at here is the "bottom line." La Tomate has slightly improved its bottom line from the previous year.

Profit Margins: Another sign of good management and a sound financial position is that the gross profit and net profit margins remain consistent, or improve from year to year. La Tomate has been able to improve both margins from 1996 to 1997. However, at a closer look, in spite of a 7% increase in Tuition Revenues, Course Materials and Services has declined. Additionally, Selling and Promotion has declined significantly. This may be a sign of jeopardizing the future by enhancing the present.

Another item of interest is the allocation of Salaries and Wages. La Tomate's Salaries and Wages as related to providing student services has declined. However, the Salaries and Wages as related to operating expenses has increased. A question to ask is, "Does this salary increase goes primarily to officers and/or shareholders?"

Travel and Entertainment expenses also seems high for the size of La Tomate. Again, is this for the benefit of officers/shareholders having a good time at the expense of student services? Insurance expense also seems unreasonably low for La Tomate. Are they adequately insured? Legal expense also seems high. Are they incurring legal problems that need further investigation?

Statement of Cash Flows

(See page 121.) Sound financial management will stress the importance of positive operational cash flow—can the company generate cash rather than consume it? Are funds available to take care of students for the duration of their contract? A company that has a negative cash flow will have to borrow money to maintain its business.

The statement of cash flows is actually three statements in one:

1. operating activities
2. investing activities
3. financing activities

The top section of the statement of cash flows is the cash generated from operating activities and is the most important indicator as to whether management is generating cash from its day-to-day operations.

Footnotes

(See pages 122-124.) Footnotes can provide the most information about the financial operations of the business as well as interpret the statements themselves for you. If statements are prepared by independent CPA's, footnotes will be included. As mentioned earlier, footnotes will explain significant accounting principles followed by the school including revenue recognition, inventory costing, or any unusual items unique to the business.

Most importantly, **footnotes are required** to explain related party transactions, legal commitments of the school, and debts owned by the school. These three items can provide a world of information to the reader regarding the business practices of management. You can learn whether the officers/owners appear to be stripping assets out of the business by information regarding related party transactions. You can learn whether the school

is embroiled in litigation or undergoing regulatory problems. And, you can see what type of debt and required repayment terms exist. Will the school be able to meet is obligations?

About the Author

Robin H. Scheiderman, CPA

Robin Hanson Scheiderman is the Director of the Oceanside Bank in Jacksonville, Florida. Since 1992, Ms. Scheiderman has had her own CPA practice in St. Augustine, and, until May 1996, she served as the CFO of California College for Health Sciences in National City, California. Prior to opening her own practice, Ms. Scheiderman was the Director of Taxes at Florida Rock Industries, Inc., headquartered in Jacksonville.

Ms. Scheiderman has been licensed as a CPA by the Florida State Board of Accountancy since 1979 and has been a member of the American and Florida Institutes of Certified Public Accountants since 1980. She received her B.B.A. and M.A. degrees from the University of North Florida and received a diploma for the completion of the CFP Professional Education Program from the College of Financial Planning in Denver, Colorado.

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La Tomate Culinary Institute

Balance Sheet

ASSETS	December 31, 1997	1996
Current Assets:		
Cash	2,391	-2,065
Investments	10,000	10,000
Accounts Receivable, Net of Allowance of $3,500 and $2,500	97,352	83,658
Loans to Shareholders	50,000	5,000
Inventory	5,629	6,250
Prepaid Expenses	13,659	29,526
	179,031	132,369
Fixed Assets:		
Property, Plant & Equipment	202,657	190,257
Accumulated Depreciation	96,990	86,540
	105,667	103,717
Other Assets:		
Security Deposits	10,000	10,000
TOTAL ASSETS	294,698	246,086
LIABILITIES		
Current Liabilities:		
Accounts Payable	39,560	27,598
Royalty Payable	12,650	10,290
Salaries & Wages Payable	52,320	25,500
Employee Benefits Payable	20,250	15,250
Prepaid Tuition	12,350	12,350
Taxes Payable	11,525	1,230
Current Portion of Long-Term Debt	25,000	25,000
	173,655	117,218
Long-Term Liabilities:		
Long-Term Debt, less current portion	100,000	125,000
Stockholders; Equity:		
Capital Stock Issued	500	500
Additional Paid In Capital	5,000	5,000
Retained Earnings	15,543	-1,632
	21,043	3,868
TOTAL LIABILITIES AND EQUITY	294,698	246,086

La Tomate Culinary Institute

Statement of Operations

	December 31, 1997	1996
Tuition and Contract Revenues	823,590	769,230
Cost of Revenues:	62,359	56,923
Course Materials & Services	80,290	85,385
Salaries & Wages	5,690	6,457
Program Expenses	39,250	35,690
Royalties	187,589	184,455
Gross Profit	636,001	584,775
Operating Expenses:		
Selling and Promotion	185,620	238,640
Salaries & Wages	181,950	156,720
Payroll Taxes	22,290	20,579
Employee Benefit Plan	20,250	15,250
Health Insurance	16,925	14,400
Travel & Entertainment	39,759	32,590
Legal & Accounting	25,500	7,800
Insurance	250	250
Office Supplies	4,000	2,500
Collections Expense	9,000	6,000
Rent	48,000	48,000
Utilities	3,300	3,000
Repairs & Maintenance	15,600	14,400
Taxes & Licenses	6,200	5,300
Depreciation & Amortization	10,450	10,450
Bad Debt Expense	750	500
	589,844	576,379
Income From Operations	46,157	8,396
Other Income/Expense:		
Investment Earnings	600	600
Interest Expense	-18,000	-8,000
	-17,400	-7,400
Income Before Provision for Income Taxes	28,757	996
Provision for Income Taxes	1,582	55
Net Income	27,175	941
Retained Earnings, Beginning of the Year	-1,632	-2,573
Distributions to Shareholders	-10,000	0
Retained Earnings, End of the Year	15,543	-1,632

La Tomate Culinary Institute

Statement of Cash Flows

	December 31, 1997	1996
Cash flows from operating activities:		
Net Income	27,175	941
Adjustments to reconcile net income to net cash provided by operating activities		
Depreciation	10,450	10,450
Changes in assets and liabilities		
Marketable securities and other investments	0	-10,000
Accounts receivable	-13,694	-10,951
Inventories	621	-531
Prepaid expenses and other	15,867	-26,516
Accounts Payable	11,962	-22,561
Accrued expenses	44,475	-25,421
Net cash provided by operating activities	96,856	-84,589
Cash flows from investing activities:		
Purchase of property and equipment	-12,400	-56,400
Net cash used by investing activities	-12,400	-56,400
Cash flows from financing activities:		
Increase in loans from officers	-45,000	-5,000
Distributions to shareholders	-10,000	0
Repayment of debt	-25,000	0
Proceeds from borrowings	0	150,000
Net cash used by financing activities	-80,000	145,000
Increase in cash	4,456	4,011
Cash, January 1	-2,065	-6,076
Cash, December 31	2,391	-2,065

La Tomate Culinary Institute

Notes to Financial Statements

(Unaudited)
December 31, 1997

Note 1: Summary of Significant Accounting Principles

Organization: La Tomate Culinary Institute (the "Institute") is a for-profit educational corporation offering distance education opportunities such as training in paraprofessional and occupational culinary fields. Students reside throughout the United States.

Investments: Investments consist of certificates of deposit with original maturities in excess of three months and are carried at cost, which approximates market value.

Furniture and Equipment: Furniture and equipment are recorded at cost and are depreciated on straight-line and accelerated methods over their estimated useful lives ranging from 3 to 10 years.

Revenue Recognition: Tuition revenues are recognized upon shipment of courses. Each course covers a period of eighteen months for which students may pay on an installment basis.

Inventories: Inventories consist of course materials, including textbooks, and are stated at lower of cost, determined by the first-in, first-out method, or market.

Prepaid Expenses: Prepaid expenses include certain advertising costs that are capitalized and expensed at the time of the publication of the related advertisement.

Note 2: Furniture and Equipment

Furniture and equipment consist of the following as of December 31, 1997 and 1996, respectively:

	Dec. 31, 1997	Dec. 31, 1996
Furniture, fixtures and equipment	$161,496	$149,096
Automobile	41,161	41,161
Less accumulated depreciation	(96,990)	(86,540)
	$105,667	$103,717

Depreciation expense for the years ended December 31,1 997 and 1996 was $10,450 for each year and is included on the accompanying Statement of Operations.

Note 3: Commitments

The Institute leases its operating facilities under the terms of a three-year non-cancelable lease agreement expiring in April 1998. The lease requires the Institute to pay various operating expenses in addition to stated rent. Future minimum lease payments under the terms of the agreement are as follows:

Year Ending December 31, 1998	$4,000

Rent expense for the facility for the years ended December 31, 1997 and 1996 was $48,000 for each year and is included in the accompanying Statement of Operations.

The Institute maintains various royalty agreements under which the Institute is obligated to make royalty payments based on a percentage of the selling price of certain books and programs. Royalty expense for the years ended December 31, 1997 and 1996 was $39,250 and $35,690, respectively, and is included on the accompanying Statements of Operations.

The Institute is currently negotiating a repayment schedule with the Internal Revenue Service for the payment of delinquent payroll taxes and related penalties and interest resulting from a poor cash flow during 1997. It is the opinion of management that a reasonable repayment schedule will be worked out without having a material adverse effect on the financial position of the Institute. The delinquent payroll tax liability at December 31, 1997 is $11,525 and is included on the accompanying Balance Sheet.

Note 4: Profit Sharing Plan

The Institute maintains a profit sharing/401(k) plan covering substantially all full-time employees. The Institute may make discretionary contributions under the plan, based on the Board of Directors' approval. The contributions for the years ended December 31, 1997 and 1996 are $20,250 and $15,250, respectively, and is included on the accompanying Statement of Operations.

Note 5: Income Taxes

La Tomate Culinary Institute operates as a Subchapter S Corporation. Income and expenses for the school pass through directly to the shareholders and are reported on their individual income tax returns. In accordance with FAS 109 "Accounting for

Income Taxes," the provision for income taxes has been computed based on current and estimated future income tax liabilities. The Institute is subject to a state franchise tax of 5.5% of taxable income for the years ended December 31, 1997 and 1996.

The $1,582 and $55 income tax provision for the years ended December 31, 1997 and 1996, respectively, included on the accompanying Statement of Operations represents the current state franchise tax only.

Note 6: Debt

	Dec. 31, 1997	Dec. 31, 1996
Long-Term Debt:		
Installment note maturing on June 30, 2001, with interest at 13%	$125,000	$150,000
Less current portion of long-term debt	(25,000)	(25,000)
Total Long-Term Debt	$100,000	$125,000

The installment note is collateralized with a personal guarantee by one of the shareholders of the Institute. The maturities in each of the following years are: 1998=$25,000; 1999=$25,000; 2000=$25,000; and 2001=$50,000.

Note 7: Related Party Transactions

Outstanding cash advances of $50,000 and $5,000 at December 31, 1997 and 1996, respectively, to a shareholder of the Institute are unsecured and bear interest of 6% per annum.

Note 8: Prepaid Expenses

	Dec. 31, 1997	Dec. 31, 1996
Prepaid Advertising	$ 8,759	$ 23,500
Prepaid Dues	2,400	2,400
Prepaid Royalties	2,500	3,626
	$13,659	$ 29,526

The above costs are amortized over the related period of time to which they relate.

Session Seven

The Committee Chair

In this session you will learn what the responsibilities are of the Committee Chair. This individual is charged by the Commission, and aided by the Commission staff, in preparing the key "actionable" document of the findings resulting from the on-site evaluation: the Chair's Report. Much of what you do as a member of the committee will be reflected in the Chair's Report. Now, let's look at what you can expect from your Committee Chair and learn about the importance of the Chair's Report.

The Responsibilities of the Committee Chair

After evaluators have proved themselves by participating in a number of school reviews, they may be asked to fill the key job of Committee Chair. If you are a new evaluator, do not worry. It sometimes takes years, and many evaluations, before you may be asked to be a Committee Chair. As a Committee Chair, you will be expected to do the following:

Your Committee Chair keeps a task list of what needs to be done during the day, and adjusts the schedule and assignments accordingly.

1. Guide the Committee before and during the Evaluation

The Committee Chair gives structure to the entire team effort. This is similar to the head coach of an athletic team. The head coach rallies the assistant coaches to prepare for the big game, then as the game is played, the head coach makes mid-course corrections. This is what the Committee Chair will do. Except, unlike the head coach, the Committee Chair, through the Chair's Report, decides who won or lost the game.

Starting before the on-site visit, you may hear from the Chair. The Chair may just introduce himself or herself to you, check on your progress in reading the SER, or clarify your travel plans.

Your Committee Chair will help to point the way during your on-site visit. Be flexible and willing to take on last minute assignments.

The Chair will run both the executive breakfast and lunch meetings. During the day of the review, the Chair may ask you to change directions, interview some other staff members, or do additional follow-up. Sometimes, because time is short, the Chair may ask you to help another team member who is running behind time. When asked, we hope you will volunteer to help your Committee Chair.

2. Serve as the Voice for the Committee

Just as the head coach speaks for the athletic team, the Chair speaks for your team and for the Commission. If a decision needs to be made on-site, then the Chair, with the advice of the Commission staff or observer, will decide what needs to be done.

3. Be the Role of Time Keeper

Just as in athletics, someone must keep the game on time. It is the same with your committee. The schedule that the Chair sets **must** be kept if the committee is to complete its tasks on time. With the differences in travel arrangements, arrival and departure times, etc., your time keeper (the Chair) will keep the team on task, but the Chair needs your help to do it.

4. Write the Chair's Report

As mentioned earlier, the Committee Chair will write the Chair's Report on the institution. This report, based on the individual reports prepared by the evaluators and curriculum reviewers, will report on whether or not the school meets the respective standards of the Commission. The Chair's Report is the legal record of the on-site visit, thus it is very important to the Commission and to the applicant institution.

Duties of the Chair Before the On-Site Visit

You have a good idea what your tasks are during the evaluation, but what does your Committee Chair do? As you probably guessed, the Chair's tasks are very similar to yours, but with a few more items added, such as the following:

1. **Read and evaluate the SER**

   Yes, the Chair also must read the SER, make judgments based on the information contained in the SER, and become thoroughly familiar with the total operations of the institution. While not specifically responsible for a single section, the Chair is responsible for comprehending the entire SER!

2. **Note problems and questions to ask during the visit**

   Just as you do, the Chair will write down questions to ask during the visit. But, the difference may be that the Chair will ask you to pursue the questions and report back on the answers. Your Chair has limited time, thus he or she must ask you to help gather necessary information.

3. **Assign special tasks to committee members**

   Based on the Chair's knowledge of your personal strengths or special skills, the Chair may ask you to do some special evaluations. The Chair may ask you to help someone in a special area because you are strong in that area. Do the Chair and your group a favor; accept these additional tasks in the spirit of teamwork in which they are given.

4. **Coordinate the day of the visit and the schedule of the visit**

   The Commission staff will schedule your on-site visit, set arrival and departure times, and handle the many small details that help to make your visit productive. If you need something special, meals, access to a phone, etc., coordinate that through the Commission staff. The Chair will oversee the on-site visit and help to answer any questions you may have.

The Orientation Executive Breakfast Meeting

Okay, it's the morning of your first school evaluation. You have re-read the SER, reviewed your notes, and are now ready for the morning executive breakfast meeting. Because it's your first meeting you may not be sure what to expect. In this part of this session we will review what goes on in this very important breakfast meeting.

- **Be on Time**

  One of the best pieces of advice experienced evaluators can give you during your school visit is to be on time for everything. As author John H. Aughey said, "Lost time is never found again." When you are on a school visit this is especially true. A few minutes late for meetings or in getting to your next interview can mean the difference between completing and not completing the review.

  The Examination Schedule (which is sent to you before the visit) will state the beginning time for the breakfast meeting. Please keep to that schedule. This meeting sets the tone for the day, so start off on the right foot.

Your Committee Chair needs to know how all of the interviews fit together. Keep your Chair informed about what you find throughout the day.

- **Setting the Tone for the Day**

  The Committee Chair will set the tone for the day. Expect this to be a serious one. After all, you have a weighty responsibility to the Commission, to your fellow evaluators, and to the students and public who depend on your decisions. While you may, after a few evaluations, know the other team members very well, keep the tone of your visit professional. The Chair will help set this tone for the school visit during the morning breakfast meeting.

- **Orientation to the Tasks and the Institution**

  During the morning meeting you may be asked to introduce yourself to the other Committee members. Think ahead of time what you will say. Your introduction should include your areas of expertise. Then if questions arise in these areas, the other examiners will know who to ask.

  Your Chair will divide the tasks for the day. The schedule for arrival and departure times for the day will be discussed.

- **Meet the State Representative**

  At the morning meeting you may also meet the state representative (if one attends). You can expect the state representative to tell you something about the institution, how it is viewed by the state, what problems you may want to look for during the day, and other information that will make the visit more productive. Remember, the state decides which schools to license and which not to license. Their rules may be similar to the Commission's standards, but you are to evaluate the institution based on the Commission's standards, **not** those of the state. The state will usually make its licensing decisions independently of the Commission's decisions on accreditation.

- **Review Reports and Discuss Questions to Be Answered During the Day**

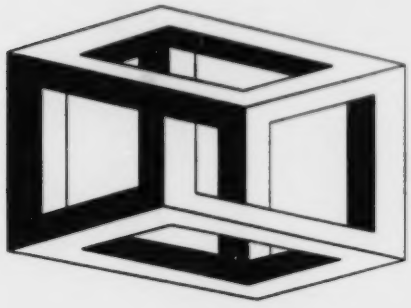
  During your morning meeting, your Committee Chair will review with you the reports of the subject specialist(s), discuss the student surveys, review the summary of student complaints received by the Commission, ask for things that you want to review, and ask for points that have come up in the readings of the SER by the team members. In addition, the Commission's representative and staff member may have new information for your visit. So, come prepared to discuss the SER and to take notes. Either at the breakfast or lunch meeting, the Committee Chair will set the deadline for the submission of the written reports. If the date "will not work for you," then tell your Chair. Sometimes exceptions can be made, but try your best to make or beat the deadline for your report.

  Now you are ready for the trip to the institution. You will probably need to check out of the hotel immediately after the breakfast meeting, so have all of your things packed and ready to go. Transportation will be arranged to the institution, and you will generally travel as a group or in a caravan.

Orientation at the School

Upon arriving at the institution, you will be introduced to the key school staff. Even if you know these individuals well from your work with the DETC, you must keep a professional posture with them. You are now, after all, representing the Commission. You will find your headquarters for the visit, learn about the lunch arrangements and where to use a phone, and then take a quick tour of the institution. Remember, during the tour you must **not** ask questions. Rather, just find out how the business office functions and where the people are that you will need to interview later.

In some cases your Committee Chair may make last minute changes to the assignments based on the tour. For example, if a key staff member is sick or unavailable that day, you must see someone else. This is the time to be very flexible, and be ready to turn on a dime. In addition, the Chair may schedule a mid-morning meeting to see where everyone is on their interviews. Likewise, there may be a mid-afternoon meeting to accomplish the same thing.



The report of the subject specialists and student survey results may give you a new direction to explore during the on-site visit.

After your orientation you are off on your assigned tasks. Remember, this is the time to be very professional. You must not tell the school personnel whether what you are seeing is positive or negative. Be neutral: look, listen, ask questions, but do not tell the school staff what you think. Share your comments with your Committee Chair and other committee members, **not** with the school personnel.

The Working Luncheon Meeting

Around noon the Committee Chair will call all members for the working lunch. Once again be on time for this meeting. During lunch you will be asked the following questions:

- What progress have you made on completing your rating form?
- What problems or situations have you discovered during the morning?

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- What new directions do you want to pursue based on what you have learned?
- What assistance do you need to complete your work?
- What is your initial reaction to the institution, the personnel, and the records and files you have reviewed?
- When can you finish all of your work?
- When can you have your report written and sent?
- What additional documents do we need to request from the institution?
- Has every key school staff member been interviewed?

There is nothing quite so disheartening to a school staff member who prepared diligently for the on-site review, than to have no one visit and interview him or her. After lunch, you will return to your scheduled interviews and file inspections. Again, a mid-afternoon meeting may be called by the Committee Chair to assess everyone's progress and status.

Concluding the Site Visit and Leaving the Institution

At the pre-established time your Chair will ask all members to return to the meeting room to conclude the visit. This will be your last chance to share any observations, problems, and findings with the team. After this point, it is a solo job for you, so you should listen intently to the brief presentations from the team members. Ask yourself, "Do they see the institution in the same way that I do? If not, what is the difference and why do their views conflict with mine?"

The Committee Chair will reconfirm the due date for your report, and remind you about the confidentiality of the process.

There is no exit interview with the CEO of the institution. The

visit ends with a brief conference between the Chair and the CEO. The Chair may ask for further information that the Committee will need for its report and inform the CEO of an approximate date when he or she may expect to receive a copy of the Chair's Report. The Chair thanks the CEO for the cooperation and hospitality received. The Chair does not discuss the findings of the Committee nor is he or she authorized to say anything that implies acceptance or rejection of the institution by the Commission.

Now you're off to the airport or on the highway heading home. It is important to leave the institution as a single group. This will provide a sense of "closure" to the visit for every participant.

After the Visit

While you are at home writing your final report, the Commission staff will be doing its follow up work. They will write thank you letters to the institution, explaining that the Chair's Report will be mailed to the institution and that the institution will have an opportunity to respond before the Commission acts on the accreditation request. In addition, the institution will be advised that it may request a personal appearance before the Commission prior to the Commission's action on the Chair's Report. The CEO of the institution is also encouraged to comment on the visit and the accreditation review.

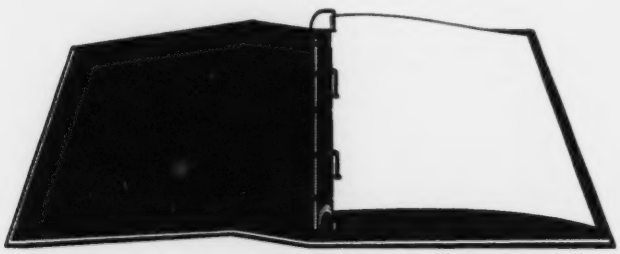
Survey After Visit

After you have completed your report and mailed it to the Commission, the Commission staff will send you and all the members of the examining committee a "Questionnaire for On-Site Examiners" (Appendix J. 6 of the *DETC Accreditation Handbook*). Please complete the survey and return it to the Commission staff as soon as possible. Your answers to these questions and your comments will help the Commission revise and/or update the

appropriate standards and consider possible changes in the accreditation process.

The Purpose of the Chair's Report

As a committee member your summary rating form and accompanying material are combined by the Committee Chair to accomplish the following:



The Chair's Report advises the Commission about the overall findings of the Committee.

1. Inform the Institution of the Committee's Findings

The Chair's Report is written in such a way as to give the institution a composite picture of the findings of the evaluation team, and to make the institution aware of the team's decisions about which Commission standards the institution does and does not meet. This is why, as you write your report, it is important to anchor your findings back to the Commission's standards. The Chair's Report is organized so that the institution can address each point raised.

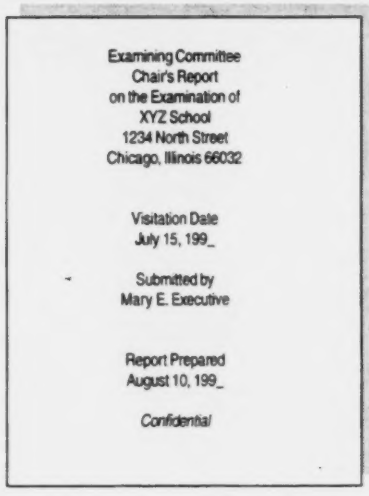
2. Report to the Commission

The Chair's Report is the document of record that reflects the committee's evaluation of the institution's ability to meet each of the standards. Therefore, the report will reference "chapter and verse" of the standards and policies of the Commission. The report will take note of the way the institution analyzed its problem areas and addressed each area covered by the standards.

The Chair's Report, unlike the reports of individual evaluators, is the official report on the on-site visit. It is retained in the permanent records of the Commission. The report will become one of the primary documents used in the Commission's deliberations. Thus, the Chair's Report is a vital document, both to the Commission and to the applicant institution.

What's in the Chair's Report?

As an evaluator, you may never see an actual Chair's Report, so it's important that you have an idea what one looks like. The report is composed of the following:



Examining Committee
Chair's Report
on the Examination of
XYZ School
1234 North Street
Chicago, Illinois 66032

Visitation Date
July 15, 199_

Submitted by
Mary E. Executive

Report Prepared
August 10, 199_

Confidential

Sample cover page of a Chair's Report.

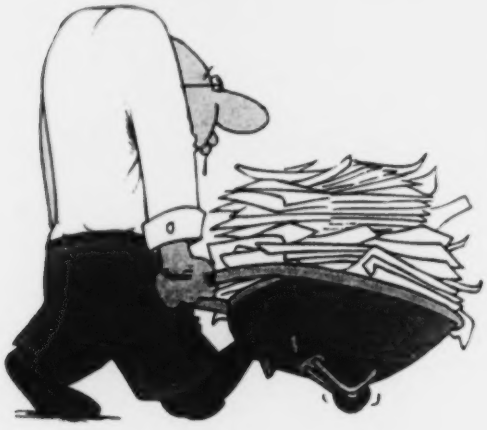
- **Cover sheet** giving the date of the visit, institution's name and location, and the name of the evaluation Committee Chair.
- **Summary** of the examining committee findings as to the areas in which the institution either meets or does not meet the standards of the Commission. Each standard will be addressed separately in the report.

- **A narrative report** integrating and summarizing the comments of the committee members.

The Chair's report is based on the following materials:

1. The SER—the document that began the evaluation process;
2. The educational standards and business standards evaluators' reports;
3. The report(s) of the subject specialists on the curriculum;
4. The student survey results and any student complaints;
5. Observations of the state representative;
6. The Committee Chair's own findings and recommendations; and
7. Other information provided to the Committee.

Your Chair will analyze the findings in the individual evaluators and create a composite report on the institution. The Chair uses a consistent style of writing in the report, and writes in the third person. For example, "The examining committee found that . . . ." The language of the report is non-threatening and collegial in tone. Power words and words that cause emotions to run high are avoided. Direct lifts of language taken from the committee mem-



The Commission's staff will notify you when you may destroy all of your records about the school visit.

bers' reports—without specific attribution—may be used, and the report **may** offer recommendations to the school for improvement.

The Chair's Report will cite the Accrediting Commission standards as appropriate.

The report has a "Summary of Findings" section that briefly summarizes the committee's report. This is usually a list of declarative sentences, one covering each of the 12 accreditation standards.

Two copies of the report are sent to the Commission staff. The staff in turn sends one copy to the institution for its analysis and comment. Once submitted by the Committee Chair, the report is not edited or changed in any way by the Commission staff. Thus, the report reflects the actual work of the committee as prepared by your Committee Chair.

Once your report has been submitted and received by the Commission staff, you will be notified in writing that you should destroy all copies of your notes, rating forms, SER, and other materials. Do not destroy materials **until you are notified** by the Commission staff that your report has been received.

School's Response to the Chair's Report

As mentioned above, the institution has an opportunity to respond to the Chair's Report. The institution has 14 days from the receipt of the report to respond and to request an opportunity to appear before the Commission. The institution, at a minimum, should respond to the Commission and indicate that the report was received. Often institutions will make comments on the report. This is especially true when areas in the Chair's Report indicates the institution does not meet specific standards. The institution is expected to address the standard(s) in question.

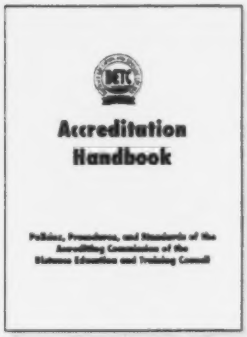
There are times when a committee member makes a remark, suggestion, and/or recommendation during the on-site visit. Such remarks should not be taken as final positions of the committee, but rather as constructive thoughts which are being shared freely. Any oral remarks made by the evaluators during the on-site visit are **not** a part of the Commission's official record and institutions should not look to them as evidence.

The institution has the opportunity to correct any findings presented in the Chair's Report before the Commission takes final action on the institution's application for accreditation. The institution must address only the facts presented in the Chair's Report in its response to the Commission.

The institution may, at its option, choose to appear at the Commission meeting at which its application for accreditation is considered. The institution must request this in writing, telling the Commission the names of the representatives of the institution who will appear. The Commission will establish an approximate time for the school representatives' appearance. The Commission will only accept written correspondence from the institution on the Chair's Report. Faxed documents may be sent, but they must be confirmed by the receipt of the original, signed documents.

The duties of the Committee Chair are many and varied. Your Committee Chair serves as a guidance counselor for the team members. The Chair and the other evaluators represent the Commission and the public in this most important process. To be selected as Chair by the Commission is one of the highest honors the Commission can bestow on a distance education professional.

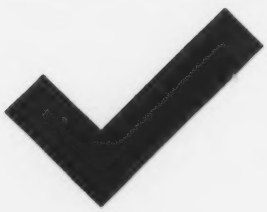
Handbook Reading Assignment



Your reading assignment for this session is to re-read the following in the *DETC Accreditation Handbook:*

- Appendix E—"Guide to Chair's Report"
- Appendix J. 2—"Tips for Accrediting Commission Evaluators"
- Appendix J. 3—"Standards of Ethics for Accreditation Participants"
- Appendix J. 5—"A Special Message to Evaluators of the Confidentiality of DETC Accreditation"
- Appendix J. 6—"Questionnaire for On-Site Examiners"
- Appendix J. 7—"Guidelines for the On-Site Visit"

Session Seven — Quiz



This is your seventh self-check quiz. Only one more to go! We hope you will take the quiz to check your comprehension of what has been presented. The correct responses to the quiz are provided at the end of this session.

Instructions

Select the correct answer for each statement or question.

1. During the on-site evaluation who speaks for the Commission when decisions must be made?

   a. Commission Observer

   b. Commission staff member on the visit

   c. Committee Chair

   d. school CEO

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2. When a representative from the state licensing department is on the on-site visit, how should you handle information that he or she provides?

    a. Information should be disregarded unless it directly applies to the business standards of the Commission.

    b. Information should be disregarded because the state decides its own criteria for licensing.

    c. Information should be considered as supplemental and used as appropriate during the review.

3. When might the Committee Chair make last minute changes to assignments and schedules?

    a. at the morning breakfast

    b. at the mid-morning or afternoon meeting

    c. at the noon lunch

    d. all of the above

4. What is the deadline for an institution to request a hearing by the Commission from the receipt of the Chair's Report?

    a. between the 1st and 6th day

    b. between the 1st and 12th day

    c. between the 1st and 14th day

    d. between the 1st and 28th day

Summary of Session Seven

The Committee Chair has one of the most important roles in the accreditation process. The Chair orchestrates the visit, coordinates the on-site day, and develops the final report based on

input from a variety of individuals. Serving as the Committee Chair, while challenging, is the pinnacle of involvement in the non-governmental peer review process. To be asked to serve in this most important role is a high honor.

Correct Answers to Session Seven Quiz

1. c — The Committee Chair is the "officer in charge" during the site visit, and may make instant decisions for the Commission as appropriate.

2. c — The information from the state regulator is supplemental to the standards of the Commission, but may help guide the evaluators in their review of the institution.

3. d — The Committee Chair may make adjustments to the schedule at any time; therefore, prompt attendance is important at all meetings.

4. c — The institution must request a hearing by the Commission within the first two weeks (14 days) of the receipt of the Chair's Report.

Session Eight

Report Writing

This is the final session in this course. We know that many people do not enjoy writing reports, but written reports are the vital link in the DETC accrediting process. They communicate your findings to your Committee Chair, and from the Committee Chair to the Commission. In this study session we will be using Appendix D. 1 in the *DETC Accreditation Handbook.* The "Examiner's Rating Form for All Institutions" is a necessary resource.

Review of the Examiner's Rating Form

By now you should have looked through the Rating Form several times. (At least we hope so!) Let's begin by taking a look at the various sections of the form, who completes which part, and the form itself.

According to the position in which you are serving on the examining committee, you will complete the following:

- **The Educational Standards Evaluator**

  If you are the educational standards evaluator or the degree evaluator, then you will be completing **Sections 1 through 7**—or the first 21 pages of the form, and **Section 12** (pages 30 through 32). If you are the degree evaluator you **also** will complete the special rating form that will be discussed later in this section.

- **The Business Standards Evaluator**

  If you are serving as the business standards evaluator then

the sections you will be using are **Sections 7 through 12**, or pages 19 through 32.

- **The Subject Specialist**

  If you are the subject specialist evaluating the curriculum at home, then you will be using Appendix D. 2, "Overview to Subject Specialists," "Examiner's Rating Form for Subject Specialists," and "Summary of Examiner's Rating Form for Subject Specialists." If you are the on-site subject specialist, you will be using **Sections 1 through 6**, or pages 2 through 19 of the "Examiner's Rating Form for All Institutions."

Transferring Information to the Summary Sheet: The "Examiner's Rating Form for All Institutions" that you complete is designed to help you write your report to your Chair. After you have completed the rating form, you will transfer your overall ratings onto a "Summary of Examiner's Rating Form." You only submit the "Summary of Examiner's Rating Form" and your accompanying narrative to the Chair and the Commission staff. No one should ever see your completed Examiner's Rating Form, as this is your personal worksheet. The Commission sees only the Chair's Report, not the individual examiner's reports.

Now that you know how the "Examiner's Rating Form for All Institutions" is organized, lets look at the form more in-depth.

The Structure of the Rating Form

The Examiner's Rating Form is your memory jogger—it helps to jog your mind about each of the important standards the Commission uses to make accreditation decisions. As you look through the form you will see it corresponds directly to the questions in the SER the institution completed. This makes it easy for you to answer the questions on the rating form (in pencil the first time) as you read through the SER. As the evaluator, you are **not** limited to the questions on the form. As you think of

additional questions, just write them on the form or in your notes for the school visit.

The Simple (or Not so Simple) Yes or No Responses

As you go through the form, check either "Yes" or "No" to each question. If the question does not apply to the institution then write "NA" on the form. You may also want to put the reason why it does not apply next to that question. That way you can compare notes with your other team members and resolve any differences of opinion.

Sometimes it is not clear if an institution meets or does not meet a standard. This is where you have to make a decision.

At the end of each standard (see the top of page 3 of the rating sheet for an example), you are asked to summarize your "vote" on that standard. Now comes the fun part—what happens if you have 8 "yes" checks and 1 "no" check? This is where you as the evaluator must decide just how far from the standard the institution is and just how important the standard is that it missed.

Let's say that the institution missed Standard I, A., 2. on the advertising and promotional literature, but passed all the other standards. Well, this is an important standard because without this one, the remaining ones will not matter. If the institution is not honest in its advertising, then something very wrong is going on.

In each set of standards there are some points or characteristics that are of supreme importance. You have to decide not only if the institution meets the standards, but for any standard that

the institution missed, just how important is that characteristic to the institution's ability to meet the particular standard. Here the Chair or the Commission staff will be glad to help you if you request it. Be sure to call if you are confused, and find it hard to make a decision. When in doubt also note these concerns in your written report to the Committee Chair.

Document All "No" Answers

As you proceed through your section of the Examiner's Rating Form and when you write your report to the Chair, you **must** tell the Chair why the institution failed to meet the standards that you checked "No." Therefore, you should take clear notes as you go through the form, listing why you believe the institution failed to meet the standard. This will help you in writing your narrative report later.

Write to the Audiences

Okay, you have completed your rating form, completed your on-site visit, and are ready to sit down and write your report to the Committee Chair.

There are two distinct audiences for the report you are writing. You should consider both when you write your report:

1. **The Institution**

   The institution spent a lot of time and money on the accreditation visit, so it is the first audience for the written report. Even though the institution never gets to see your individual evaluator's report, comments you make in your report may be included in the Chair's Report, which the institution does see. So, carefully explain what standards the institution meets and which standards it fails to meet. What, if anything, can you say to the institution that will help them meet

all of the standards in the future? The most important point to remember is to list all of the facts.

2. The Committee Chair

As the evaluator, you must communicate your findings clearly to the Committee Chair. The Chair must be able to

The Commission depends upon what you write to your Committee Chair, and what the Chair includes or does not include in the Chair's Report. Say what you mean, and say it clearly and succinctly.

translate what you say and present a clear and factual composite report to the Accrediting Commission and the institution. If you find the institution has missed a number of standards, then give the Chair the necessary documentation and evidence to include in the final report. For example, if the institution has missed Standard III., A. 1. (concerning the appropriate test items to measure what the course is teaching), then you may want to write something such as the following:

"Institution missed Standard III., A, 1. The tests developed in the course did not adequately measure whether or not the student learned the material presented. It is recommended that the tests be rewritten to better determine if learning occurred and the extent of that learning."

Your Chair is the **most important** audience for your written report.

Tips on Writing Your Report

The following are some tips for writing your report:

- **Write the Report As Soon As Possible**

  We know you've heard this before, "Write your report as soon as possible after your on-site visit." This is the best time because your memories of the institution will still be vivid.

- **Use the Third Person**

  When you are writing your report, write in the third person. For example say, "The Business Standards Evaluator found that the school's accounts receivables were overstated by $305,000 for its last fiscal year."

  The use of the third person makes the report more impersonal and professional. It is not necessary to use pronouns such as I, We, Us, Me, etc., in your writing.

- **Use the Roman Numerals Found in the Rating Form**

  When you are referencing a particular section of the SER or of the rating form, use the Roman numerals, capital letters and numbers found in the Commission's documents.

  For example, if you are commenting on the appropriateness of the institution's admissions policies for the course of study, then the correct reference is "VII. A. 1."

Standard VII. B. 4.

Guidelines for Additional Comments

If you have comments on the school visit that do not seem to fit anywhere else in your report, you may save them and put them a final summation of your report. However, keep these guidelines in mind when you are writing your report:

1. Do **not** tell the institution that they must change a practice. Any change should be their decision. You may suggest or recommend, but not demand.

2. If you give the institution a "no" on a standard, then you may want to offer a suggestion that the institution can **consider** to the correct the problem. It is up to the institution to decide if they want to take these suggestions.

3. Whenever possible, you should use language similar to that found in the rating form. For example, using item VII. A. I. (from above), if the school failed to meet the standard you could say: "The student files reviewed by the Educational Standards Evaluator indicated that the students admitted to the course were unqualified, and generally unprepared and unacceptable for the type of course they took. This may explain the low course graduation rate." In this way, you are using language that is similar to the standard.

4. Do **not** recommend that the Commission either accredit or deny accreditation to the institution. This is the sole function of the Commission and it makes its decision based on all of the evidence in the record.

5. Check spelling, grammar, and punctuation before you send in your report. While computer spelling and grammar checkers are getting better, do not depend on them to catch every error. Read your report out loud to see how it sounds. Sometimes when you write something down on paper, it is not quite the same when you read it aloud.

6. You can comment on other sections of the rating form that you have observed on the visit. However, it is best to check with your Chair before doing so to see if that will fit into the overall report the Chair has planned.

7. If you make recommendations, make them clear, especially if you want the Commission to get the point. For example, by just stating, "Refunds are not accurate," the message could get lost in the Chair's Report. You could say the same thing but in stronger terms. For example, "The tuition refund policy of DETC is not followed by the institution. The institution's policy is, etc." This statement will get noticed, where the first may be missed by the Chair and the Commission. This type of statement cries out to be answered by the institution. The Commission will probably get a response from the institution with the second statement, but may not with the first statement.

Your report is critically important. Carefully consider what you have written and how it might be interpreted by others.

Putting All the Information Together

The following is a checklist that is useful when you sit down to complete all of your forms.

- ❒ Complete **all** the relevant rating forms before you attempt to write your final report. If you are missing any forms, contact the Commission staff for the missing forms.

- ❒ After completing the Examiner's Rating Form, transfer your overall ratings to the Summary Form of the Examiner's Rating Form.

- ❒ Attach your narrative report. It does not have to be a lengthy epistle. A short narrative report, well-written, is better than a poorly written, rambling, longer report.

- ❒ Send in your Summary Form and attach your narrative commentary with it.
- ❒ If you received either student surveys or subject specialist reports be sure to send these along to your Committee Chair.
- ❒ Send in your expense report to the Commission staff. The sooner you send the report, the quicker you'll get reimbursed.
- ❒ Prepare two copies of your report and narrative; one copy goes to your Committee Chair, the other to the Commission staff.
- ❒ Once the Commission staff and the Chair have received your report, you will be notified and you can destroy all your reports, SER, notes, etc.

Other Commission Forms

The Commission has other special forms that you may use from time to time. Let's review the forms briefly and tell you when you would use the forms. All of these forms are in the *DETC Accreditation Handbook.*

- **Forms for the Subject Specialists**

  Subject specialists use several forms as they review the curriculum of the school:

  - Appendix D. 2—"Examiner's Rating Form for Subject Specialists"
  - Appendix D. 2—"Summary of Examiner's Rating Form for Subject Specialists"

  As you can see, these forms are similar to the ones used by the examining committee. It is a standardized, "cheat-sheet" style form used to record information and then a summary document that is sent to the Commission.

- **Other Special Commission Forms**

  There are several other special rating forms that you may use from time to time. These are the other commonly used forms.

  > **"Examiner's Rating Form for Change of Location"** Appendix D. 3.

    When an accredited institution changes location, the Commission asks an evaluator to review the new location to ensure that it can provide the same services as the prior location.

  > **"Examiner's Rating Form for Degree Programs"** Appendix D. 4.

    Because the Commission accredits degree programs through the master's degree level, there is a special rating form for reviewing these degree programs.

  > **"Examiner's Rating Form for Combination Distance Study-Resident Programs"** Appendix D. 5.

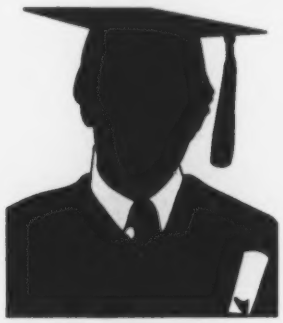
    Some schools have combination programs—a period of distance education coupled with a period of residential study. This form is used by the evaluators of such programs.

The Commission has a special form to use when an institution changes location.

> **"Examiner's Rating Form for Non-U.S. Institutions"** Appendix D. 6.
>
> Because the DETC is an international organization, when a school located abroad seeks accreditation or reaccreditation, this form is used by the evaluators.

Congratulations!

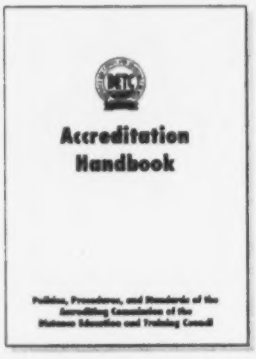
Well, that's it. You have finished this course. Congratulations! We knew that you could do it!



Congratulations, you have finished this distance learning course. Now its time to take this study session quiz, review your material and take the final exam. Good Luck!

Millions of individuals study via distance education courses each year. The Commission, with your help, certifies some of these institutions as meeting the high standards of the DETC Accrediting Commission. You are now ready to help with that effort.

Handbook Reading Assignment



Take a few minutes to re-read the following:

- Appendices D. 1. — D. 6.
- Appendix J. 6—"Questionnaire for On-Site Examiners"

Session Eight — Quiz

Just below you will find your final self-check quiz. Go ahead and take it now.

Instructions

Select the correct answer for each statement or question.

1. The business standards evaluator uses which sections of the rating form during the on-site visit and school review?

   a. Sections 1, 2 and 3a

   b. Sections 1 through 6

   c. Sections 1 through 7

   d. Sections 7 through 12

2. If a school misses a single standard, the school has:

   a. failed the entire accreditation review

   b. failed the review or that part of the review

   c. may or may not have failed the entire review depending upon which standard was missed

   d. has not automatically failed because of a single missed standard. The school must miss 10 standards before it fails the accreditation review.

3. The most important audience for the evaluator's written report is the:

a. Commission

b. Commission staff

c. Committee Chair

d. School

4. The final report is always written in the:

a. first person

b. second person

c. third person

Summary of Session Eight

The Commission's rating forms mirror the institution's SER, thus making your job as evaluator easier. Knowing which section you are to complete will help you prepare for the on-site visit. While you will be asked to take primary responsibility for a single section, you must be familiar with the responses for the entire rating form. Experienced evaluators know how to reach an overall rating for each standard. Knowing your audiences will help you write your narrative. Your Chair is the primary audience for all of your written materials. Use the language of the standards in writing your comments.

All reports are written in the third person, with complete references to the standards as listed in the rating form. There are special rating forms used, for example, to evaluate degree programs, or when a school changes location.

Correct Answers to Session Eight Quiz

1. d — The business standards evaluator will be responsible for Sections 7 through 12.

2. c — An institution that misses a standard may, or may not have failed the entire review, depending upon which standard was missed.

3. c — The Committee Chair is the most important audience for the evaluator's written report.

4. c — The reports are always written in the third person.

Final Examination

Instructions

This session contains the final examination for the DETC Evaluator Training Program. Because this course has emphasized the school's SER, a portion of your final examination is based on information found in the following Self-Evaluation Report. This SER has a number of "problems," and it is designed to allow you to find these problems and make judgments on those problems.

This sample has been made up, with various problems intentionally included. Most of these you would not find in a "real life" SER. All characters, institutions, associations, and agencies used in this SER are fictitious and any resemblance to actual persons or organizations is purely coincidental.

The Final Examination consists of 40 multiple choice questions (worth 2 points each) and 5 essay questions (worth 4 points each). You must receive a score of 70 percent to pass.

The questions for the final examination follow the SER (see pages 241-256). Please complete the "Final Examination Answer Sheet" on page 253 and return it to DETC for grading. Also, don't forget to fill out and return the blue "DETC Professional Qualifications of Accrediting Commission Examiner" form found in this binder.

Good Luck!

"The Accrediting Commission looks to its volunteer corps of well-trained, highly talented, fair-minded and enthusiastic evaluators to serve as its eyes and ears. The personal integrity of those who would answer the call to serve on examining committees is the single most important ingredient for the success and public acceptance of DETC's internationally renowned accreditation program."

Patrick M. Keller, Chair
Accrediting Commission of the
Distance Education and Training Council

June 1997

1999

Self-Evaluation Report

Data presented for the consideration of the

Accrediting Commission of the

Distance Education and Training Council

by

Tollin School of Accountancy
11515 West Commercial Boulevard
Fort Lauderdale, FL 33309
934-851-4000

The data submitted herewith are certified correct
to the best of my knowledge and belief.

_____

Harold P. Tollin, President

July 31, 199X

Copy no. 1 of 10 copies

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Directions to the Tollin School of Accountancy

Address and Phone Number: TSA is located at 11515 West Commercial Boulevard, Fort Lauderdale, Florida 33309. The main telephone number for the school is (934) 851-4000. The map on this page should be helpful to you.

Directions from the Fort Lauderdale/Hollywood International Airport to TSA: The school is located approximately ten miles west of Interstate 95 on the North side of Commercial Boulevard. Coming from the Fort Lauderdale airport, exit the airport property on Interstate 595. The second exit is for Interstate 95 north to Palm Beach. Take this exit, go through downtown Fort Lauderdale, past the Sunrise and Oakland Park Boulevard exits. The Commercial Boulevard exit is the next exit. It is a right-hand exit. (If you go too far, the next exit is approximately 1 mile farther; this is the Cypress Creek exit). Rejoin the Interstate by following the signs. Once on Commercial Boulevard, you will pass a set of train tracks, and Powerline Road. The school is ahead approximately 9 miles at this point. If you pass the school, you may go to the next light (121st Street) and make a U-turn. The School's main offices are in Room 109 of the TSA Building. The Building is well marked.

Institutional Summary Profile

1. Institutional History

A. *Trace a brief history of the institution showing the founding date, changes of name, creation of new divisions, new training sites, and any major changes in ownership and management.*

Harold P. Tollin, a nationally known accountant, founded the Tollin School of Accountancy (TSA) in 1995. Active in both the Florida Accountant's Association (FLAA) and the United States Accountant's Association (USAA), Mr. Tollin, in order to ensure quality courses, has a board of distinguished accountants from throughout Florida and the world. This board of advisers, meeting at a minimum of once a year, advises the President on changes in the area of accounting, reviews course work, and recommends modifications to the core curriculum of the school.

B. *Describe the history of major changes in the institution within the last five years with respect to the addition of student services, changes in admission standards, the addition of new personnel, changes in marketing procedures, etc.*

Answers to B. are described and discussed in C.

C. *Explain why each change came about.*

TSA made several major changes during the last several years. During 1996 and 1997, the administration of assignment grading, recording of grades, diploma order processing, and other student services personnel and processes were changed with the aim of simplifying and speeding work flow, thus providing better customer service.

In 1995 TSA established the Education Advisement Department with a staff of 4 that advise prospective students on the educational options available at TSA. By offering a number of courses, from beginning to advanced, the School provides a means for a current student, or professional accountant, to take courses in which they are interested. The help of professional

advisors allows TSA students to determine the best courses of study for them, so that they can achieve their educational and personal goals.

On the recommendation of the advisory board committee, the School added two new courses, *Accounting via the Internet,* and *Accountancy in the Global Marketplace,* which were introduced over the past several years.

D. *Describe the major changes made during the last five years relative to marketing and sales and why the changes were made.*

In July, 1995, TSA enrolled its first student. The initial class included 4 students from within and outside of Florida. The beginning courses were at the entry-level of accountancy. Therefore, the marketing was to primarily young adults seeking their first jobs, or for those individuals who needed retraining due to downsizing. The Vice President of Marketing is Ivan Miser, a former TSA instructor, a state-certified high school Social Studies teacher, and TSA Employee of the Year in 1996. Mr. Miser manages the educational sales for TSA.

TSA increased the number of incoming toll-free telephone lines, hired and trained a staff of three to respond to written, fax, E-mail and telephone inquiries. Thus, the School has expanded its capability to:

- offer improved student/customer enrollment services;
- give prospective students more individual attention with regard to questions on programs;
- supply immediate feedback on inquiries and more comprehensive follow-up; and
- enroll students faster so they can start their TSA learn-at-home experience sooner.

In the last two years, TSA staff have attended professional meetings of accountants throughout the Southeast and in Florida. The School's professionals seek liaisons with professional accounting associations. This has improved our marketing efforts because it delivers enrollment opportunities to new groups of prospective students. Presentations and lectures are offered at no charge at many of these events, demonstrating the content and expertise of TSA education to wider audiences. TSA staff actively seek enrollments, dis-

tribute promotional literature, talk to prospects, and accept applications for its various programs.

2. Institutional Organization

A. *Supply an organizational chart of the school showing the relationships among its component parts. Include names and titles of employees.*

See Organizational Chart, Exhibit X (not included with this Final Examination).

B. *Describe other schools or institutions affiliated in any way with the institution or under the same organizational structure, management, or ownership. Include cooperative training programs or formal affiliations that exist with colleges, vocational schools, businesses, or other home study schools.*

TSA has no licensing agreements with individuals and organizations, all students are enrolled through TSA's Registrar's Office. TSA courses have been translated into Spanish, and are offered abroad in South America and other Spanish speaking locations. No other school in the United States is owned by, or affiliated with, TSA.

C. *If external centers, enrollment offices, or training sites exist, describe in full and give their locations.*

No other offices exist.

D. *Describe fully any international distance study activities, affiliates, or divisions.*

See 2. B. above.

1. *Explain how and where exam services are rendered for these students.*

The exams taken in Spanish are graded in the Fort Lauderdale headquarters of TSA, as are student exams in English.

2. *List how many foreign students are enrolled annually.*

   Approximately 49 foreign students were enrolled in distance study in 1996. Projected enrollment of foreign students for the *Accountancy in the Global Marketplace* course is expected to go to 75 by January 1998. The total foreign students enrolled, using the projected enrollment plus the 1996 figures, is 120.

   Breakdown by course is as follows:

TSA Course Title	# of Foreign Students
Accountancy in the Global Marketplace	70
Accounting via the Internet	49
Total	119

3. Legal Form and Governance

A. *Describe the legal form of the institution.*

The Tollin School of Accountancy is a for-profit educational organization incorporated under the laws of Florida, and is licensed to do business in Florida, California, and New York. It is a wholly owned subsidiary of TSA Enterprises, Inc., which has two other divisions: TSA International Accounting Corporation, Internet Accounting Services, and Tollin International, P.A.

B. *Provide the names and addresses, terms of office, and occupations of any governing board members.*

The following is a list of TSA owners:

Harold P. Tollin, President
1234 West Half Way Road
Fort Lauderdale, FL 33301

(President and CEO, majority stock holder)

Prudence I. Tollin, Treasurer
1234 West Half Way Road
Fort Lauderdale, FL 33301

(Treasurer and minority stock holder)

C. *Explain the authority of any agency, other than the governing board, which has power to initiate, review, or reverse actions of the school's management.*

Other than the licensing powers of the State of Florida, and the effects of DETC accreditation standards, the stockholders have sole authority over the School.

D. *State the ownership of the institution.*

See B above.

E. *If the institution is a stock corporation, list the names and addresses of any persons or organizations owning 10% or more of the voting stock.*

See B above.

4. Chartered Purpose/Mission

State the institution's (or the parent organization's and/or division's) purpose/mission as stated in its charter or other enabling instrument or legislation. Describe any organizational constraints imposed on the institution by virtue of its charter.

TSA's incorporation specifies that the School is organized exclusively for educational purposes in the areas of accountancy. By its incorporation, TSA is further empowered to publish and distribute books, pamphlets, and periodicals on international accountancy.

5. Institutional Goals

A. *List the goals/objectives of the institution that should lead to the successful achievement of the institution's mission. Describe the process by which the organizational goals/objectives were developed (include names of those who participated in their development).*

TSA's Mission & Core Activities: TSA's mission is to offer entry and upper level courses in accountancy, both within and outside of the country. Its core activities include courses leading to a certificate from

TSA attesting the individual's proficiency in entry level accountancy, and middle and advanced levels of accountancy.

B. *Describe how the organizational goals/objectives are evaluated and updated, and how frequently.*

The stockholders review the aspects of the School's goals each month, and set short and long-term objectives annually at the fall stockholder's meeting.

C. *Describe how the institutional goals are communicated to administrative staff, faculty, students, and to the public.*

New staff first are informed about TSA's mission through the *TSA Employee Handbook* issued on their first day on the job. Students and the public are made aware of TSA's basic goals and mission through the school's Education Catalog.

6. Approvals and Accreditation

A. *Supply the names of any local, state, or other government or non-governmental agencies by which the institution is licensed, approved, or accredited. Give dates of license and/or first approval and subsequent re-approvals (provide documentation).*

The Tollin School of Accountancy is approved by the Florida State Department of Private Education (FLDPE), and is also approved by the Department of Veterans Affairs for participation in the G.I. Bill. State approval is granted upon application every three years, and the School's application for renewal of approval is under consideration at this time.

TSA is seeking initial accreditation from the Accrediting Commission of the DETC.

B. *If the institution was ever denied approval or accreditation or had approval or accreditation withdrawn by an agency (including the DETC Accrediting Commission), give name of the agency, the dates of the action, and details.*

The School initially was not licensed by the State of Florida due to technical issues in the application. Since being licensed by the State, it has never been denied its annual re-licensure.

7. School and Course Data

Using institutional records, construct a table (see attached sample) that provides the data below for each distance education course offered by your institution:

See page 9 of this SER.

a. title of course ("Title")
b. type of course (indicate if it's distance study [DS] or combination distance study-resident training [C-DS]) ("Type")
c. date (month, year) first student enrolled ("1st Enroll")
d. date course was last revised ("Lst. Revised")
e. number of new students enrolled in the last full calendar year ("New Stu.")
f. number of students completing course in the last full calendar year ("Stu. Complete")
g. number of school evaluated assignments, lessons, or examinations ("Graded")
h. total clock hours typical enrollee must spend to complete the course ("Clock Hrs."). Explain in a footnote the method used to determine clock hours.
i. maximum number of months students are allowed for completing the course ("Max. to Comp.")
j. type of completion documents and credits awarded (e.g., diploma, certificate) ("Comp. Doc.")
k. total course price (tuition, fees, books, equipment, etc.) ("Price")
l. method of financing student tuition (by percentage) ("Financing"):
   - cash basis (CB)
   - school financing (SF)
   - third-party financing (3rd)
   - government financing (GF)
   - other financing (OF) (explain in footnote)
m. indicate if course is eligible for special financing (e.g., G.I. Bill, DANTES, etc.) ("Spec. Prog. Fin.")

Table 7 - Institutional Summary Profile

Title	Type	1st Enroll	Last Revised	New Student	Stu. Comp.	Graded	Clock Hours	Max. to Comp.	Comp. Doc.	Price	Finan.	Spec. Fin.
Cert. Prog. in International Accountancy	DS	1996	1996	106	2	2	300	36 Months	Certificate	$2,795	CB=.85 SF=.15	VA
Cert. in Internet Accountancy	DS	1996	1996	135	3	3	100	24 Months	Certificate	$1,095	CB=.90 SF=.10	--
Basic in Accountancy Cert.	DS	1995	1995	302	4	4	200	24 Months	Certificate	$1,895	CB=.95 SF=.05	--
Advance Accountancy Cert.	DS	1995	1995	78	5	5	215	36 Months	Certificate	$2,495	CB=.93 SF-.07	--

Standards for Accreditation

I. Educational Objectives

Summary of Standards: Institution has reasonably attainable and clearly stated educational course objectives.

A. Description of Objectives

Standard: Educational objectives are clearly defined and simply stated. They indicate what the educational program can do for reasonably diligent students. The character, nature, quality, value, and source of the instruction and educational service are set forth in language understood by the types of students enrolled. If a course prepares for an occupation or field of occupations, the objectives clearly state the types of occupations for which preparation is given.

1. *State the educational objectives of each course or program offered by the institution (what the educational program can do for reasonably diligent students).*

Basic Accountancy

Students enrolling in the Basic Accountancy Certificate course will learn entry-level bookkeeping and accounting terms, and calculations. Students will be exposed to the basics of computer spread sheets. Students completing the entire program can reasonably be expected to obtain entry-level employment as bookkeepers or accounting clerks.

Advanced Accountancy

Students enrolling in the Advanced Accountancy Certificate course will learn advanced accounting techniques and terms. Students are provided a personal computer spread sheet program on which they are expected to become proficient. Data base management tools are part of the advanced curriculum. Students completing this course can reasonably be expected to obtain advanced bookkeeping and financial data management positions in small to medium size companies.

International Accountancy

Students enrolling in the International Accountancy Certificate course will learn about the global marketplace, common rules and regulations for the largest of the U.S. trading partners, including Mexico, Canada, Great Britain and France. In addition, students learn methods of transferring funds from this country to other countries. Students completing this course of study can reasonably be expected to find employment in small to medium size companies that engage in international trade.

Internet Accounting

Students enrolling in the Internet Accounting Certificate learn the positive and negative facts about doing accounting via the Internet. Basic Internet languages, such as HTML, are learned as part of this course. Students will be able to set up their own home pages on the World Wide Web (WWW), and transfer all required homework via the Internet to TSA. Students completing this course of study can reasonably be expected to find entry-level positions with financial institutions, agencies, and small to medium size companies engaging in accounting via the Internet.

2. *Describe the procedure used to ensure that the institution's advertising and promotional literature claims for the course(s) are in consonance with course objectives.*

   All new advertising copy is reviewed by the Education Director before it is published, to ensure that benefits and claims are accurate and in consonance with course objectives.

3. *For vocational/occupational courses, describe the occupation for which the course prepares students as referenced in the Dictionary of Occupational Titles of the U.S. Department of Labor or other similar references.*

   Basic Accountancy = DOT Code 011-123-568
   Advanced Accountancy = DOT Code 011-213-458
   International Accountancy = DOT Code 011-312-775
   Internet Accounting = DOT Code 011-412-568 or 027-368-446
   (Note: All code numbers are fictitious.)

4. *State how the course objectives indicate the type of student for whom the course is intended.*

   Each student is instructed to carefully read each course description in our education catalog. In addition, there is a section titled "Who Can Benefit," listing the types of individuals whose skills would be enriched through completion of that particular course.

5. *State how the course objectives indicate the kind of education or training offered, and describe the expected outcomes, in terms of skills, knowledge, licenses, or degrees which graduates will possess.*

   See Item 1, description of Educational Objectives.

   Expected outcomes, by course:

   After successfully finishing the **Basic Accountancy Certificate** course, a student should be able to apply knowledge of basic accounting in a small to medium size company, in an entry-level (non-professional) position. Students completing this course earn a TSA Certificate.

   A student who successfully completes the **Advanced Accountancy Certificate** course can seek and obtain employment in up to medium size companies and organizations. The individual will be able to function at most duties that do not require the work of a Certified Public Accountant. A student who successfully completes this course earns a TSA Certificate.

   A student who successfully completes the **International Accountancy Certificate** course should be able to seek and obtain employment in small to medium size companies engaging in international trade, or in financial institutions that transfer funds to other countries. Successful completion earns the student a TSA Certificate.

   A student who successfully completes the **Internet Accountancy Certificate** course should be able to do basic programming on the Internet, understand one or more Internet development languages, be able to set up their own home page, and create hypertext links in the WWW. Successful completion earns the student a TSA Certificate.

6. *State the relationship between the institutional mission and the needs of the public served, i.e., describe what social and educational/training needs are being met by the course.*

   The mission of the Tollin School of Accountancy is to develop individuals in the area of accounting who can contribute to the business vitality of the global marketplace. To do this, TSA uses state-of-the-art distance education methods to teach students by providing beyond just the basics of similar courses. Students not progressing are counseled by the TSA staff, and if the course does not meet their needs, an appropriate refund is made.

7. *Provide evidence supporting any advertised employment opportunities that will be available for graduates for each program with occupational objectives.*

   We do not advertise specific employment opportunities linked to distance education courses and programs.

8. *Provide supportive data and information on the employer acceptance of graduates of the institution's vocational/occupational courses.*

   TSA's history of acceptance in the area of accountancy, while brief, has been quite successful. Of the students completing one of our programs of study, fully ten percent (10%) found positions in businesses or organizations related to their levels of training from TSA. Those not directly employed in accounting programs have often been employed in the retail trade industry, and many indicate that they are continuing their search for a position in accountancy. TSA does not survey employers of its former students.

9. *For degree-granting institutions, describe how the educational objectives for your programs are comparable to those of accredited resident institutions for the award of degrees of the same nature and level.*

   Not applicable.

B. Appropriate Objectives

Standard: The objectives of the institution must be reasonably attainable and be [added 1/96] of such a nature that they can be achieved through distance study. For non-credit courses, the learning objectives must, where appropriate to the nature and type of the course, be comparable to similar non-credit courses offered in traditional institutions [added 1/96]. Appropriate objectives include the development of skills, the provision of job-related training, the imparting of information, the training in the application of knowledge, and the development of desirable habits and attitudes. Evaluation of the educational program is based on the announced course objectives and the success with which the objectives are fulfilled.

1. *Describe the process by which the objectives are determined or revised for the institution and for courses.*

   The executive management of TSA, through the office of the President, establishes educational objectives. School management determines what courses to offer by contacting members of our advisory committee. New courses are written by the Course Development Specialist, who is also responsible for revision and updating existing courses.

2. *Explain how the objectives are kept up-to-date and the ways in which institution officials interact with relevant communities of interest to keep the institution and course objectives current.*

   Our staff has ongoing contact with our students, and advisory board members, to help us keep abreast of new techniques in accountancy. We also subscribe to major commercial newsletters and magazines and trade publications. TSA's Course Development Specialist is responsible for monitoring industry and general news for events that may affect course material, and recommending changes in curriculum based industry standards.

3. *Describe how objectives are achievable through the distance study method, and tell how the institution determines the extent to which stated course objectives are achieved, i.e., describe what outcomes assessment measures are used to determine course outcomes.*

Course objectives directly relate to the written course material. Instructors monitor students' comprehension of this material by the completion of quizzes at the end of course assignments. Instructors remain in contact with their students by mail, telephone, and TSA-Net (TSA's computer bulletin board which is accessible by direct dialing or through the Internet). Students must score at least 75 percent on each quiz, and on the final exam, for satisfactory course completion.

4. *Explain how the course objectives meet the employment needs in the market for the prospective student.*

   Senior staff interact with accounting professionals currently working in the field to ensure that our objectives in each program meet the needs of the marketplace for trained individuals.

5. *Explain how outcome assessment data are used for quality control and improvement of courses and educational services.*

   We assess our outcomes by the number of individuals who enroll versus those who complete the program. We are pleased that as many as five percent (5%) of our initial enrollees go on to graduate.

6. *Give examples of how surveys of students, outside evaluations by experts, comments from students and employers, and evaluations by school staff are used to assess the success of the institution in meeting its overall institutional objectives and to continually upgrade services and courses.*

   TSA uses a mini-quiz to survey the feelings of our students about their course of study. This survey is part of the required examinations that the students should return. In addition, the School uses its expert advisory board for input on the success of the School and its graduates.

7. *For combination distance study / resident programs, describe how the predominant form of instruction is distance study.*

   TSA does not offer combination residence/distance classes.

8. *For institutions with combination programs, describe the extent to which residential and/or external independent study are used to supplement the overall correspondence method.*

   TSA does not offer combination residence/distance classes.

9. *For institutions offering non-credit courses, explain how the learning objectives, where appropriate to the nature and type of the course, are comparable to similar non-credit courses offered in traditional institutions [added 1/96].*

   Not applicable to TSA's courses. To our knowledge there are no comparable programs available in traditional institutions.

II. Educational Materials

Summary of Standards: Institution offers educationally sound and up-to-date courses.

A. Comprehensive Instructional Materials

Standard: Instructional materials are sufficiently comprehensive to achieve the announced objectives.

1. *Explain and provide a summary of how students who have completed the course have learned enough to achieve the announced course objectives.*

   The first step we take in creating a new course is to develop overall objectives for that course. Our next step in the development of a course is to "subdivide" the overall objective to create the outline for individual assignments. These assignments work toward the overall course objective. We then develop tests that measure the students understanding of the material (or mastery of a skill, in the case of a skill-based assignments). Thus, the courses are both written and tested to meet the overall course objectives. (See also Item III. A. 7.)

2. *Describe ways in which the institution has determined that the instructional materials are sufficiently comprehensive and have sufficient depth to prepare students to master the subject.*

The most important source of information is feedback from the industry we serve. We get input from our Board of Advisors, alumni, and from current students. Responses from graduates and employers have made it clear that many of our graduates obtain jobs in the area of accounting.

3. *Explain how the instructional materials equip students to meet any stated or implied employment or vocational objectives.*

   As mentioned previously (Items I. B. 6 and II. A. 1.), we use the input from many segments of the industry when we develop the objectives for new courses. We also recruit industry subject specialists to help us develop these objectives.

B. Up-to-date Instructional Materials

Standard: Instructional materials are accurate and reflect current knowledge and practice.

1. *Provide evidence showing that course materials are up-to-date and accurate, and describe how they reflect "state-of-the-art" knowledge and practices.*

   Keeping our course material current is another goal in our ongoing contact with individuals and groups in the industry. Via our advisory board, we are able to identify changes in business trends, practices, and demographics, and then revise our courses accordingly.

2. *Describe the procedure for revising courses, and tell how often they are revised.*

   See B.1. TSA revises courses approximately every 7 to 10 years, unless because of changes in the industry, an earlier revision is necessary.

3. *Describe how content errors in course materials are corrected between regularly scheduled revisions.*

   As described in Item II. B. 1., TSA's Course Development Specialist revises and updates courses on a 7 to 10 year cycle.

C. Authorship

Standard: Instructional materials are prepared by our internal curriculum development specialist. Materials, such as case studies, are prepared by distance study educators skilled in preparing materials for correspondence and distance education use.

1. *If standard textbooks are used, list titles, authors, publishers, and copyright dates. Describe any customizing rights accorded the institution by outside publishers.*

   TSA course materials are written internally, thus no standard textbooks are used.

2. *Give the qualifications of authors and explain why the texts were selected and how they have been adapted to the special requirements of distance study use.*

   TSA's course development specialist has developed two prior distance education courses in the area of gourmet cooking. Thus, the individual has a wide range of experiences in developing complex distance education courses.

   The course development specialist is Arnold C. "AC" Waxie, BS. Mr. Waxie is a former notary public, and graduate of the New University College of the Central Caribbean (NUCCC) where he was editor of his school's newspaper. He has written a novel, *Killer Manatees of South Florida* (unpublished). Mr. Waxie reports to the President/CEO of the school.

3. *Describe how study guides are prepared for use with standard texts.*

   TSA's does not use outside standard texts, thus no study guides are developed.

4. *If outside authors prepared materials specifically for the institution, explain how they are qualified to prepare materials for use in distance study.*

   Besides the subject specialists and reviewers mentioned in Item 5, TSA does not use outside educational consultants.

5. *List the outside educational consultants, if any, who have been retained to assist in writing materials, and describe their qualifications and role.*

   TSA course materials are reviewed by our Board of Advisors. While they are not "authors" per se, they are industry experts whose comments contribute to the accuracy and excellence of our courses.

6. *Explain how subject matter experts and faculty are involved in writing or revising learning materials.*

   TSA assigns course revision to our course revision specialist, "AC" Waxie. Mr. Waxie then works with the faculty to help develop original course material and to help revise existing material.

D. Reading Level

Standard: The reading difficulty of the instructional materials is keyed to the reading competence of enrollees in the course.

1. *Provide results of the most recent readability tests or checks for courses, and describe how tests were conducted.*

   We evaluate the reading level of our materials by using the Waxie/ Skyhouse formula, which counts words, analyzes the syntax, and computes the reading level. Mr. Waxie, working with Ms. Eileen Skyhouse, while students at UNCCC, developed this formula for evaluating their student newspaper. This formula measures the grade level and degree difficulty of the course.

   Here are the statistics on individual assignments in our four courses, followed by the average cumulative reading level using the Waxie/ Skyhouse formula for each course:

- **Certificate in International Accounting Reading Level**

Lessons	#1	#2	#3	#4	#5	#6	#7	#8	#9
Word Count	7363	7668	8339	8256	7889	6078	7256	6795	6343
Waxie/Skyhouse Grade Level	9.2	8.7	8.7	9.0	8.4	8.1	8.3	7.9	9.7

- **Certificate in Internet Accountancy Reading Level**

	#1	#2	#3	#4	#5	#6	#7	#8
Word Count	7727	8204	10534	9991	5063	8473	6139	9160
Waxie/Skyhouse Grade Level	8.5	6.6	6.6	6.6	7.0	7.3	7.1	7.2

- **Certificate in Basic Accountancy Reading Level**

	#1	#2	#3	#4	#5	#6	#7	#8	#9	#10
Word Count	4433	5640	4700	4798	7436	6200	5112	4988	4263	5486
Waxie/Skyhouse Grade Level	7.7	7.2	6.8	7.0	7.6	8.4	7.9	6.8	8.2	7.8

- **Certificate in Advanced Accountancy Reading Level**

Lessons	#1	#2	#3	#4	#5	#6	#7	#8	#9
Word Count	7363	7668	8339	8256	7889	6078	7256	6795	6343
Waxie/Skyhouse Grade Level	9.2	8.7	8.7	9.0	8.4	9.1	12.3	12.9	11.7

2. *Explain how the reading level of instructional material is keyed to the reading competence of the average enrollee.*

   The highest reading level in any of our courses is twelfth grade, but only in the Advanced Accountancy Course. The average course is written at, or below, the 10th grade reading level. TSA's minimum admission requirement is a high school diploma (or equivalent). Thus, anyone enrolling in our courses has, by virtue of their education, demonstrated the ability to read and comprehend our material.

3. *Provide examples of results of any internal analyses that demonstrate that students who possess only minimum admission requirements are able to comprehend the materials and successfully complete the course.*

   We ask students to read and respond to a sample "course lesson" that is written at the 10th grade level (as verified by the Waxie/Skyhouse formula). Students must earn a minimum of 60% on this sample lesson to be allowed to enroll in any TSA course. Approximately three out of five applicants pass this reading assignment with a minimum 60% passing score, and are admitted to TSA.

E. Study Instructions

Standard: Suitable instructions on how to study the course clearly indicate to the students what to do and how to learn effectively.

1. *Provide samples of instructions to students on how to proceed through the course as a whole and to learn effectively.*

   Students enrolled in TSA courses receive a guide, *Getting the Most Out of Your TSA Course*, written by "AC" Waxie, with the first shipment of the course materials. This guide describes how the courses are administered, how to submit work, and how to study. One section of the manual, entitled "Techniques for Effective Study," offers students advice for learning success.

2. *Describe how the institution gives guidance or remediation on learning techniques to students as they proceed through the course.*

Students come to TSA with diverse educational backgrounds, training levels, and learning experience. To successfully complete the course, some students will need to reacquaint themselves with certain terms and understand basic mathematical formulas. For these reasons, remedial instruction about basic mathematical and scientific concepts supplements the accounting material contained in the course. It is sometimes within a shaded sidebar, or sometimes within the main text itself.

F. Organization of Instructional Materials

Standard: The organization and presentation of the instructional materials are in accord with sound, psychological principles of learning.

1. *Explain how the organization and presentation of the subject matter in the courses accommodate the principles of modern learning psychology.*

   In the organization and presentation of its instructional materials, TSA relies upon the most recent data available on the study habits of adult learners. Some of this data is generated by TSA through ongoing evaluations of its own students, and some of it comes from outside sources.

2. *State if students are required to submit every assignment in prescribed sequence in order to graduate and if a minimum grade is required. Describe any exceptions made to the order in which students may proceed through the course.*

   We have designed each assignment in our course to be as self-contained as possible, covering its subject thoroughly, yet short enough to complete in about two hours. Subsequent material is introduced in a carefully planned sequence. New terms are defined, and are often accompanied by pronunciation guides. However, if a student submits an assignment out of order, it is graded and recorded with no negative consequences for the student. The minimum passing grade for each assignment and final examination is 75 percent.

G. Teaching Devices

Standard: Instructional programs make effective use of appropriate teaching devices and supplemental instructional aids.

1. *Describe any kits, equipment, tools, videos, diskettes, audio tapes, online learning systems, telecommunications, CD-ROM disks, or other media used in the courses.*

   TSA uses no kits or other equipment in any of its courses.

2. *Explain how these devices enhance instruction and motivation.*

   Not Applicable.

3. *Describe how the devices are integrated with texts and lesson assignments.*

   Not Applicable.

4. *Describe any institutional policies relating to the release of kits to students, return of equipment, or any tuition payment policies affecting kits or equipment, and tell where the policies are published.*

   Not Applicable.

5. *Explain how instructional materials are supplied to the student.*

   Course materials TSA courses are split into five shipments. TSA sends course materials to students through the U.S. Postal Service using bulk mail.

6. *Provide copies of all lesson shipment schedules.*

   SHIPPING SCHEDULE

   All TSA Courses

   1st shipment - Assignments 1-2, plus *Getting the Most Out of Your TSA Course.*

   2nd shipment - Assignments 3-4, triggered by receipt of Assignment 2.

   3rd shipment - Assignments 5-6, triggered by receipt of Assignment 4.

   4th shipment - Assignments 7-8, triggered by receipt of Assignment 6.

   5th shipment - Assignment 9-10 (in those courses having more than 8 lessons), triggered by receipt of Assignment 8.

7. *Confirm that students who pay in advance for the entire course, can, upon request, receive all instructional materials if they choose to discontinue submitting required assignments.*

   Although we do not automatically ship course materials to students who pay for the course in advance, and who fail to submit any quizzes, we will do so upon request.

H. Illustrations

Standard: Illustrations are used intelligently, and they have educational and/or inspirational value.

1. *Provide representative samples (excerpted from courses) of illustrations, graphs, and drawings for educational or motivational value.*

   All illustrations, diagrams, graphs, and exhibits meet this standard because our students have told us they are encouraged to study harder because of these illustrations being placed in strategic points in each lesson.

2. *Explain how the illustrations enhance the course in regards to presentation and educational and/or inspirational value.*

   Most illustrations are specific to particular points in the text; a few are intended to be motivational or to improve the graphic layout. The placement of illustrations in relation to the pertinent passage in the text receives particular attention.

I. Printing and Binding

Standard: Instructional materials are legibly reproduced, well-manufactured, suitably bound, and attractive in layout and format.

1. *Describe the reproduction and binding process used for lessons and provide samples of typical lesson pages.*

   All TSA course materials are electronically "typeset" in the school's production department. All courses are in an 8 1/2" x 11" two-column, saddle-stitched format for ease of reading, and drilled for insertion into a three-ring binder. The TSA production department is headed by Ms. Ima Purist,

who has been in printing, and printer's ink, all of her adult life. Ms. Purist worked recently for the Alligator Press of Margate, Florida, where she was responsible for all the obituaries published in the *Margate Daily Disappointment and Ledger*. Due to the large number of elderly residents in the city, Ms. Purist gained lots of experience in layout.

2. *Describe the procedures in place to maintain overall quality of the printing, binding, and packaging process for course materials.*

   TSA courses are printed in-house on 80-pound coated stock, on the school's sheet-fed, offset press by Ms. Purist. Press checks are mandatory on all new courses, and materials may be reprinted at the discretion of the President/CEO.

3. *Describe procedures used to create effective audio or video tapes, CD-ROM, diskettes, or other non-print media.*

   Not Applicable.

III. Educational Services

Summary of Standards: Institution provides satisfactory educational services.

A. Examination Services

Standard: The submission of examinations that adequately cover the materials is required. Adequate evaluation, correction services, and necessary counseling by an instructor are provided for examinations.

1. *Describe the types of test items that are used (objective, essay, etc.).*

   We distinguish between a "quiz," which is a written exercise covering a given assignment or group of assignments, and "examinations" which are the final exam covering the material in a given course. All assignments are accompanied by either a quiz, which must be submitted for grading, or by a self-test. (Questions on assignments with a self-test are included on a subsequent quiz). These are all single-answer, multiple-choice questions.

2. *Describe methods used for submission of exams (i.e., tele-test, exam scan cards, etc.).*

Quizzes are graded the same day they are received. Students complete a ScanTron™ electronic scanner sheet with their choices. TSA staff then, before grading, check to see if the student asked a question of the instructor. If a question is on the back of the paper, it is given to an instructor for response. The graded paper is then paired with the appropriate student response letter, references for incorrect answers and comment sheet. Papers are returned to the instructor to review the machine scoring, and to add any personal comments.

Students are sent the results of each of their quizzes, together with a comment sheet that provides them with the correct answer for each question and references to the locations in the texts where the material is discussed. This is accompanied by a note from their instructor with additional comments where necessary, and a personal message of encouragement. This entire process takes only 24 hours; graded quizzes are often returned the same day TSA receives them.

Responses for some courses are computer generated.

3. *Explain if any oral or non-written evaluations are used and how they properly measure if the student has mastered the material.*

   No oral exams are given. All exams are written.

4. *Explain in what ways evaluation tools assess student achievement and attainment of course objectives.*

   The passing score for all quizzes and examinations is 75 percent.

5. *Describe how tests are checked for validity and reliability.*

   Examinations and quizzes are reviewed periodically against the course objectives. TSA staff tally the results of several exams, and analyze each question and distracter. A discrimination index, non-distracter tally, and percentage of correct answers are calculated and displayed by ParScore™ software (distributed by Economics Research Inc.). After collecting enough data, the exam is reviewed by instructors and the curriculum development specialist, and revised as needed.

6. *Explain what provisions exist for safeguarding test answers and proctoring examinations when required.*

   TSA does not administer proctored examinations.

7. *Explain how the number and length of examinations are determined and how the school ensures that the number of examinations and examination items are sufficient to measure student mastery of the learning objectives.*

   The first step in developing a new course is a working outline that lists the objectives for the course. These objectives are stated in terms of what the student should be able to do when they finish the course. The outline is used as a guide in writing the course, and also to ensure we adequately test the objectives (see Item II. A. 1.). Our outlines are developed with the input and advice of our advisory board members. All TSA courses have graded quizzes in the assignments. The number of quizzes is both a function of the length of the course, and the complexity of the subject.

   In addition to the graded quizzes, all of our courses have some sort of final examination. For each course the curriculum development specialist and faculty member determine how many questions must be asked based on the number of objectives for the course.

B. Resident Training

Standard: Resident training should supplement the correspondence/distance education course whenever it is necessary to attain the stated educational objectives.

Note: If you provide resident training as a supplement to correspondence/ distance education, also answer questions in the "Guide for Combination Distance Study-Resident Programs" found in Appendix B. 4.

1. *Describe the objectives of the resident program.*

   Not applicable.

2. *State what percentage of instruction the resident program constitutes, and list the tuition charged for each portion.*

   Not applicable.

3. *Explain at what point must a student enter the resident program.*

   Not applicable.

4. *Describe the capacity (in students taught per year) of the resident program included with each combination course offered.*

   Not applicable.

C. Handling Student Inquiries

Standard: Relevant inquiries from students are welcome and are answered promptly and satisfactorily with due regard for any legal and professional restrictions.

1. *Describe the process for handling student inquiries (written and oral) related to course content. Provide samples of responses to students.*

   It is TSA's policy that all questions be directed first to the instructor. Instructors are expected to answer all questions about assignments or related subjects. They have access to their student's academic records and are able to handle most administrative questions. They do, of course, transfer the student to other appropriate departments, such as business office, as appropriate.

2. *Detail the educational and academic qualifications of persons replying to student inquiries.*

   See Item VI. D. 1. for background information on our distance education instructors.

3. *State the average time (expressed in days) it takes to respond to a student's inquiry concerning course content.*

   All student inquiries are to be answered, or at least acknowledged, within one day. On the rare occasions an answer needs to be researched in more depth, the student is contacted and promised an answer at a later date.

4. *Discuss the process for responding to administrative requests and the average response time.*

   Same as 3 above.

5. *Explain how the institution encourages and facilitates student inquiries.*

   Students are told in the introductory letters and introductory assignments that they are free to ask questions any time they feel the need. Our toll-free 888 number is printed on all course material, and on each instructor's personalized stationary, together with their extension number and photograph. Space for questions is also provided on quiz answer sheets, and special request forms are furnished for other types of inquiries. We encourage the use of E-mail on TSA-Net, which is accessible through direct-dial, or the Internet. In addition, students are contacted by their instructor within three to five days after the initial shipment of course materials to encourage student-teacher interaction.

D. Individual Differences

Standard: Adequate provisions are made to meet the individual differences of students and to provide counseling and guidance as required to assist students to attain their educational goals.

1. *Explain what services are available for students having difficulty with the material, and describe what services are available for rapid learners.*

   Students who experience difficulties are encouraged to ask questions—in writing, by phone via our 888 number, or through E-mail. In addition we have supplemental material on topics that seem particularly difficult.

   Fast learners can progress as rapidly as they choose; they may submit their quizzes as often as they wish. Also, those who complete their course work through the TSA-Net receive immediate feedback online. Generally, in addition to telephone contact with their instructor, contact with TSA's staff (available through TSA-Net or by telephone) can satisfy the most inquisitive student.

2. *Describe what effort instructors make to provide remedial training to students experiencing difficulty with their studies.*

Instructors send supplemental information covering the subject in question, or they might suggest additional reading from the instructor's reading list. Math is a problem for some students in the beginning accounting courses, therefore the instructors often send practice problem sets with answers to students having difficulties.

E. Handling Failures

Standard: Students who fail to do satisfactory work are encouraged to continue until they either show inability to do satisfactory work or until they demonstrate satisfactory progress.

1. *Explain the process for handling students who fail to do satisfactory work.*

   Students who score less than 75 percent on written assignments are first asked to reread the assignment and submit a new answer sheet. If problems persist, the instructor provides written hints for further study, or talks to the student via telephone to help clear up difficulties or misunderstandings.

   Students who score less than 75 percent on a written final examination are given a detailed critique with suggestions for improving their performance on subsequent attempts. Students who need additional help are asked to contact their instructors, who, if necessary, review examinations with them item-by-item.

2. *Describe the procedure for students to resubmit failed assignments; explain how they are graded and what weight is assigned to the repeat assignment.*

   Resubmitted assignments contain the same questions as the original, and are graded and scored in the same manner. When a final examination is failed, a comparable test is prepared. The repeated final examinations are scored and weighted the same as the first. There are no limits to the number of times students can repeat their efforts to complete their course; there is, however, a time limit for completing a course. (See Item 3 below)

3. *Describe the institution's policy on student failure of a course and academic dismissal.*

TSA does not dismiss students for academic reasons. Students can retake the same quizzes and exams until they achieve a passing score. We do publish time limits for completing our courses, and we do enforce them. In general, a student has 18 months from the date we ship the first lesson to complete the course. Students are warned via written and oral communication at the 6, 12 and 14th month about the deadline. TSA staff send a special letter to students who have not completed 75% of the course by the 14th month. This letter is sent by U.S. Mail, certified, return receipt requested. A copy of this letter, and the returned receipt, is kept in the student's file for verification.

4. *Provide the number of students dismissed for academic failure in the most recent year and the number of those who are disenrolled for other reasons. Indicate if they were dismissed for non-payment, failure to submit exams, etc.*

   There have been no students dismissed from TSA in this past year. Students who fail to make payments for their courses are put on suspension after four months of non-payment. Course work for these students is held until their payment status becomes current.

F. Encouragement of Students

Standard: A constructive program is followed to encourage students to start, continue, and finish the courses in which they have enrolled.

1. *Explain the institution's program for monitoring student progress and for encouraging students to start, continue, and finish the course in which they have enrolled. Provide samples of motivational commentaries on student work.*

   TSA has a number of administrative systems in place to motivate students. At the time of enrollment, students receive a letter from the President/CEO welcoming them, and urging them to start their course as soon as possible. The assignments themselves include motivational material (especially in the introductions and summaries). We publish a quarterly newsletter, *TSA Bursar*©, which contains motivational articles, as well as school and industry news.

2. *Explain who checks the students' records, how frequently they are checked, and whether an automated tracking system is used.*

   Instructors, or administrative staff, check the student's records approximately every 2 to 3 months by hand. There currently is no automated tracking system. Anytime a student calls with a question, the instructor accesses the student's record on their computer. The instructor reviews the student's record while answering the question so that they can give whatever recommendations are needed.

3. *If letters or telephone calls are used to encourage submission of lessons, provide samples and explain the sequences and scheduling of their use.*

   We encourage as much contact between students and instructors as possible, and provide a number of tools to facilitate that. In our newer courses an automated PC-based system, with the instructor's analysis of the student's quiz or project, causes a personalized letter to be produced for the student. For all other courses the instructor sends a motivational message with each corrected answer sheet. For their correspondence with students, all instructors are given personalized stationary with their photo on it, and with the instructor's extension appended to the school's 888 number. (The 888 number also appears in all our assignments.) Instructors can initiate calls for any of their students, and have immediate access to the Education Director for suggestions and help.

4. *Explain how efforts to encourage academic progress are separate from efforts for the collection of delinquent tuition.*

   TSA has a separate corporation collections department. Instructors will refer students to either the TSA Enterprises Bad Debts division, or the Business Office for matters regarding payment of tuition.

G. Student Evaluation of Courses

Standard: Reactions of students are sought as one basis for evaluating and improving instructional materials and services.

1. *Describe the ways in which reactions of students are sought as one basis for evaluating and improving instructional materials and services.*

   See the answer to Item I. B. 6. on page 15.

2. *Give examples of how students are asked to evaluate the availability of academic help, encouragement to continue studying, quality of educational materials, strengths and weaknesses, level of difficulty, and the pace of the course.*

   See the answer to Item I. B. 6. on page 15.

3. *If end-of-course critiques are used, describe how they differ from regular, periodic assessments.*

   Not applicable.

4. *Provide information on the institution's "revision of course" file and how students report printing and content errors.*

   Student reported errors are noted first to their instructor, and each instructor files a "TSA Error Comment Form" with the curriculum development staff member. These are used to correct courses when next published. Courses with 25 or more "error comments" are republished within one year.

5. *Explain who maintains the revision file and how the file is used (to ensure currency of educational materials or accuracy of information).*

   The files are maintained by the curriculum development specialist. Material that has proven difficult for students is revised. TSA courses are printed in relatively small quantities so assignments can be revised often.

6. *Describe how the reactions of students are used to effect changes in educational materials and services, and discuss how ongoing assessment and revision efforts have resulted in changes made to courses or services.*

   We monitor students' reactions indirectly. Each quiz and final exam is analyzed via our ScanTron™ grading system that provides a statistical

review of the quizzes and final examinations. In addition, all student comments are compiled and analyzed during the revision of educational materials.

H. Appropriate Technology

Standard: The institution uses appropriate technology in the process of enhancing educational services [added 1/96].

1. *Describe—and give examples of—how the institution uses appropriate technology in order to enhance educational services [added 1/96].*

   Computer-based Internet technology—accessible on either IBM-compatible or Macintosh systems—allows prospective students to visit TSA's home page on the Internet, which describes the School's history, grading services, and educational programs.

   Once enrolled in any of TSA's programs, students with Internet access can complete quizzes and take exams online. Work is graded instantly, and scores are sent to a student's electronic mail (E-mail). This technology also allows teacher and student to correspond via E-mail, and "chat" sessions—real-time communication on the computer, similar to a telephone conversation—can be arranged to facilitate advising or tutoring.

2. *Discuss the institution's overall plans or approach to adopting new technology [added 1/96].*

   TSA's future technological plans include developing additional Web sites on the Internet, which would give students access to additional technical material.

3. *Discuss what equipment or technology, not currently in use at the institution, might profitably be used to improve services for students. Why haven't such technologies been adopted to date? [added 1/96]*

   Enrolling in courses and receiving grades over the telephone are technologies that have worked successfully at many universities, colleges, and vocational schools throughout the country. TSA will add this feature within the next six months.

IV. Student Services

Summary of Standards: Institution offers adequate student services.

A. Grading of Examinations

Standard: Minimum student services include prompt return of accurately graded examinations.

1. *Describe how the staff evaluates, corrects, services, and grades submitted assignments. Describe any use made of automated grading / scoring devices.*

   When assignments are received, they are processed on a ScanTron™ electronic scanner, which ensures accuracy.

2. *Explain what controls are in place to ensure the accuracy of correction, grading, and evaluation services.*

   The scanner not only scores the assignments, it evaluates each of the questions missed, and thereby enabling us to revise ineffective test items. The raw score is recorded on the ScanTron™ form, which goes to the student's instructor with a prepared letter and any necessary attachment. The instructor also reviews the raw score for accuracy.

3. *Explain how long (in days) it takes to return evaluated lessons to students.*

   The graded lessons are mailed back to the student within 24 hours.

4. *Explain the institution's system for controlling the receipt and tracking of exams and ensuring their prompt return to the student.*

   Our procedures for recording the receipt, grading and return of assignments and exams is outlined in response to Item IV. B. 2.

5. *Describe the type of assistance provided to students who fail to complete assignments successfully.*

   Students who score less than 75 percent on a written final exam are given a detailed critique with suggestions for improving their performance on subsequent attempts. Students who need additional help are asked to contact their instructors.

6. *Explain how the staff who evaluate assignments are qualified in the appropriate fields, and describe how they interact with students. Provide sample communications.*

   Our instructors are chosen carefully for their trade and educational experience. In addition to handling quizzes and exams, instructors spend much of their time on the telephone, working directly with students. They also use TSA-Net to communicate with their students.

7. *Give examples of how evaluation staff provide references to correct and incorrect answers.*

   After successful completing an assignment, a student receives a letter from their instructor. In some courses, along with the letter, they receive a comment sheet that gives the page references for both correct and incorrect answers.

8. *Specify when and how often students' academic questions on lesson assignments are referred to subject specialists for review and comment.*

   All instructors are expected to be able to answer such questions; assistance is available in the rare instance when they cannot from the School President.

B. Student Records and Materials

Standard: Ample study materials should be provided at all times to students. Essential student records should be adequately maintained.

1. *Describe what formal records are kept on students and graduates, and for how long.*

   Each assignment is logged into the computer's student records system. These records are stored permanently, along with a record of each student's tuition record. Records of our graduates include the student's last known address, and list all the certificates and diplomas the student received.

2. *Describe how the institution keeps a record of receipt, grading, and return of exams. Provide samples of relevant records.*

Assignment quizzes and exams are routed to the Student Services Department, where they are separated by course and graded, either manually or by ScanTron™. The manually graded quizzes are posted via CRT terminals; the ScanTron™ graded quizzes or exams are posted automatically on the IBM 360 computer. TSA does not return graded exams.

3. *Explain what procedures are used for the maintenance and protection of student records.*

   Only instructors, or student services staff, can access student records. Except for recording changes to a student's record, an inquiry screen is used to access the file. This prevents inadvertent alteration of the records.

4. *Describe any data processing systems—including "back-up computer file" procedures—used to maintain records.*

   Each evening, and weekly, a diskette of the day's input is prepared and stored in a fireproof safe in Mr. Tollin's office. On the last working day of the month, a back-up disk is made of the School's entire file for the month, and stored off-site in a secure location.

5. *Describe transcript services, and attach a sample of a transcript (with student name deleted).*

   Upon request, a transcript of any student or graduate's grades, graduation dates, and certificates is sent to the student. Requests for transcripts to be sent to another party must be done in writing. A student's request is handled for a $5.00 fee. See Exhibit X (not included with this Final Examination).

6. *Present exhibits of completion certificates or diplomas awarded, and explain under what authority (e.g., board, charter, state authority, trade association, etc.) they are issued.*

   Samples of the School's certificates and diplomas are attached as Exhibit X (not included with this Final test); they are awarded under a specific authorization in our corporate charter, and with the approval of the State of Florida.

7. *Describe how the institution's inventories of texts, kits, and other materials are maintained, and discuss how inventory levels are kept current.*

   Inventory systems planning is twofold. We forecast the amount of materials we will need for the next six months based on our historical usage and growth trends. Daily updates to the system ensure access to current information. The second system is based on firm orders (which are also reviewed daily) that further refine the orders for materials to be purchased (e.g., raw materials such as paper and ink) and manufactured course products.

C. Counseling and Employment Assistance

Standard: Competent counseling should be available to students on request. If employment assistance and other services for alumni are offered, they should be as described.

1. *Describe the institution's program to offer employment-related advice counseling to students and alumni, even if no formal job placement assistance is offered.*

   TSA makes available via its TSA-Net any information on job openings throughout the nation. International openings are posted on a separate "page" on the TSA-Net. No other job related counseling is done, except on an individual basis by our instructors.

2. *For courses that are vocationally oriented, submit information available on the number of alumni working in occupations related to the training provided.*

   The school surveyed graduates last year and found that 10 percent of the respondents were employed in some phase of the accounting industry.

3. *Describe in detail the services for alumni, such as student publications, associations, clubs, user groups, etc.*

   TSA allows graduates to continue to access its TSA-Net home page, thus information about the School is readily available to all current and former students.

4. *Indicate the extent to which the institution assists its graduates with job placement, and what, if any, job assistance services are offered to students and/or alumni.*

   We do not have a job referral service.

5. *Indicate what promises, if any, are made to prospective students in terms of job placement or job advisory assistance.*

   TSA does not guarantee employment upon graduation.

6. *Explain how the institution fulfills any stated or implied job placement service promises made to students.*

   See Item IV. C. 4.

7. *If the institution advertises or provides a placement service, complete the table below for each course that includes a placement service.*

   TSA instructors do not provide placement services to students or graduates.

V. Student Success and Satisfaction

Summary of Standards: Institution has demonstrated ample student success and satisfaction.

A. Student Success and Learning Outcomes

Standard: The institution can show that a high proportion of students are satisfied with the training and educational services provided [changed 1/96].

1. *Describe efforts made to determine student success and satisfaction, and explain how the institution measures the outcomes of its course offerings.*

   TSA sends out survey forms to all students after they complete 50% of the course, and to all graduates of our programs. Student letters, whether positive or negative, are reviewed by the School President, so TSA can benefit from the observations of our students.

2. *Demonstrate—with sample student comments or those of employers or graduates—that students are satisfied with the course, as well as with the educational services offered. Attach summaries of student letters, surveys, assessment interviews, and testimonials that indicate overall satisfaction with the institution.*

   See student and employer letters, Exhibit X (not included with this Final Examination).

3. *Describe the ways in which a student "complaint file" is kept and how it is categorized, investigated, and resolved satisfactorily.*

   Student complaint files (both "open" and "closed") are maintained in the office of the School President who is responsible for researching the facts surrounding the complaint. Once the complaint has been investigated, the School President meets with the appropriate staff members to resolve the situation. The solution is documented in the files and the student is notified of the decision.

B. Progress Through the Course(s)

Standard: The institution can demonstrate that [added 1/96] a satisfactory percentage of enrolled students start the course, continue their studies, and finish. A sample check of the students in the institution [changed 1/96] must indicate a reasonable achievement in, and completion of, their course and satisfaction with the services which the institution is rendering.

In order to demonstrate that students progress through their courses in satisfactory numbers, the institution should present a data chart for each of its major courses, i.e., courses with significant enrollments.

The chart should show the student non-start rate, the lesson completion rate, and the course graduation rate. These rates are computed for a representative group of enrollees, each of whom has been enrolled in the course long enough to have graduated from it.

- **Non-start rate** is the percentage of enrolled and registered students in an institution's course or program who did not submit any required examination or lesson assignment for grading or servicing. A non-start is a student who is disenrolled in a course after registration, after the applicable cooling-off period, but prior to submitting the initial assignment.

- **Completion rate** is the ratio of assignments actually completed (the numerator) to the total number of required assignments in a course (the denominator).
- **Graduation rate** is a percentage of students in an institution's course or program who have satisfactorily completed all of the prescribed requirements of a given course or program.

Example: XYZ Institution's Computer Repair course has 12 lessons with a total of required 12 examinations. The total number of students who enrolled in the course is 430. Of this population, 67 people did not submit the first exam. The course data chart should look like the one on the next page.

If the course includes resident study, a chart showing the non-start, completion, and graduation rates should be prepared for the resident portion as well as the distance study portion. The data should be based upon the number of days in resident training rather than "lessons."

Exceptional cases: If an institution offers a course that has only two or three submissions/examinations, the institution need only submit the following information for that course:

Name of Course
Number of Lessons in Course
Number of Submissions/Examinations
Number of Enrollments
Non-Start Rate
Completion Rate
Graduation Rate

All Institutions: In addition to providing the charts and data requested above, please answer the following questions:

1. *Describe how the non-start, drop-out, and completion rates are satisfactory in light of the nature of the course, the student body, and similar accredited distance education programs.*

   Our non-start rate is satisfactory, but could always stand improvement. We require a $50 down payment, which seems to eliminate those students who are "just shopping," and do not plan on enrolling in the courses.

We have been informed that our completion rates are similar to other distance education schools. However, we do continue to look for ways of improving lesson and course completion.

2. *Describe any follow-up studies done on a continuing basis concerning student lesson completions.*

   TSA has not conducted any completion rate analysis.

3. *Describe how these studies have been used to improve completion and graduation rates.*

   Not applicable.

C. Achievement of Learning Objectives and Benefits [added 1/96]

Standard: The institution has in place an ongoing procedure that can demonstrate that a satisfactory percentage of graduates: (1) have attained the learning objectives established for the course; and (2) have been successful in achieving the benefits established for the course [added 1/96].

1. *Describe the institution's ongoing procedures for conducting outcomes assessment [added 1/96].*

   As a result of this self-evaluation, we have discovered that our student satisfaction surveys were not routinely being sent with course materials. We have taken this opportunity to review our survey process, and plan on changing this process.

2. *Give the percent of graduates for each major course who attained the learning objectives established by the course and explain how this was determined. Provide supporting data or evidence [added 1/96].*

   The majority of our students work in some trade, but unfortunately, only about 10% are employed in the accounting field. The school has no reason for the small number who seek and find employment in the area of accounting.

   See the label list provided to DETC, Exhibit X (not included with this Final Examination).

3. *Give the percent of graduates for each major course that have been successful in achieving the benefits established for the course and explain how this was determined. Provide supporting data or evidence [added 1/96].*

   TSA had determined that about 10% of its graduates are employed in the area of accounting, though most other former students are employed, many in service industries. TSA believes that all graduates, no matter the job they are employed in, have benefited from the training they have received. See the completion graphs, Exhibit X (not included with this Final Examination).

4. *Provide, or cross reference to other sections of this Self-Evaluation Report, any other data or documentation that demonstrates that the institution delivers what it promises to students [added 1/96].*

   TSA promises its students they will receive up-to-date training from trained and experienced accountants, and we deliver on that promise. Cross-references are as follows: (not included with this Final Examination)

VI. Qualifications of Principals, Faculty, and Staff

Summary of Standards: Institution has competent administrators, faculty, and staff.

A. Owners, Principals, and Executive Staff

Standard: The institution's owners, principals, officers, and managers possess sound reputations and can show a record of integrity and ethical conduct in their business relations. The Chief Executive Officer and top school administrators possess appropriate backgrounds, qualifications, and experience for their positions and have demonstrated the ability to direct school operations successfully.

1. *Give the name, position, and qualifications of the senior executive officers.*

   This item is discussed below each individual's name after Item 4.

2. *Explain how the chief executive officer and other senior staff possess the background and demonstrate the ability to direct the institution's operations ethically and successfully.*

   This item is discussed below each individual's name after Item 4.

3. *Explain what experiences the executive staff has in distance/correspondence education methodology and administration.*

   This item is discussed below each individual's name after Item 4.

4. *Describe any previous educational administrative positions held by senior officials.*

   • Harold P. Tollin, President and CEO

   Mr. Tollin has a Bachelor of Arts Degree in Accountancy from the New University College of the Central Caribbean (NUCCC) and is a registered CPA in the State of Florida. He is the author of *Living Well, Enjoying Life, My Days as a Private School Owner*. Published last year by the Ralph Crandal Press. This best selling book has been a hit among certain audiences. Mr. Tollin is also head of TSA Enterprises, Inc., TSA International Accounting Corporation, Internet Accounting Services, and Tollin International, P.A.

   • Prudence I. Tollin, Treasurer and Director of Education

   A graduate of the New University College of the Central Caribbean (NUCCC) where she met her current husband, Ms. Tollin has a degree in Home Economics - Caribbean Style (BS), and is a registered Home Decorator in Florida (FL # 12387-007). Ms. Tollin has 3 years experience in the distance education field, and has authored an article, "Pink is My Color, What is Your Color?" in the February, 19xx issue of the *New South Florida Reporter,* Vol. 45, #7.

   • Parker J. Mony, Vice President and Chief Financial Officer

   Mr. Mony is a graduate of TSA, one of the first graduates of the Basic and Advanced Accounting courses. Mr. Mony is a lifetime member of the Better Business Bureau of Greater Western Broward County, where he

was recently honored as "Fraud-finder of the Year." Mr. Mony is responsible for all aspects of TSA's fiscal services. He is proud to say, "I'm not only a Vice President, but also a graduate of TSA."

• Ivan G. Miser, Vice President (Marketing)

Mr. Miner "Closer" has twenty-five years in sales. First employed by Smith's Auto Emporium and Breakfast Bar, Mr. Miner has had many successes in his long experiences in sales. Named "Used Car Salesman of the Year" by the South Florida Used Car Salespersons Association (SFUSA), Mr. Miner is a proud member of South Florida Marketing Association, where he is chair of the fund raising committee. He is a graduate (BS Marketing) of the Walden Pond School of Marketing (WPSM).

B. Educational Director

Standard: A qualified person serves as the educational director. The educational director has overall administrative responsibilities for the educational program and a policy-making voice in advertising, sales, and collections.

1. *List the educational qualifications of the educational director, and describe the type of experience he or she has.*

   The functions of an Educational Director are done by Ms. Prudence I. Tollin, and her qualifications are outlined in our response to Item 6.A.4.

2. *Describe the educational director's responsibilities for the educational program.*

   Ms. Tollin is responsible for all aspects of the educational and training components of TSA.

3. *Discuss to what extent the educational director is involved in overall policy development, advertising, sales, and collection activities.*

   Ms. Tollin works closely with President Tollin, and other corporate officers and executive staff, in the development of TSA's overall policies on development, advertising, sales, etc.

C. Department Heads

Standard: In large institutions, department heads or other qualified persons are delegated educational, editorial, and research responsibilities within their subject fields.

1. *Describe the major functions of the department heads, if any. Attach job descriptions. If an educational director functions in place of a department head, mention this.*

   See job description for the Director of Education, Exhibit X (Not included in the Final Examination).

2. *For each department head, indicate the following information.*

   TSA has one other major department head, Mr. Arnold C. "AC" Waxie, our Course Development Specialist

   a. *amount of weekly services rendered ("Weekly")*

      He works 40 hours per week.

   b. *extent of formal education ("Educ.")*

      BA (art history) from New University College of the Central Caribbean, San Jose, Costa Rica, 1990.

   c. *type of special training ("Spec. Trng.")*

      Florida Writers Academy, Coral Springs, FL. 1995.

   d. *experience qualifying him or her for the position ("Exper.")*

      Mr. Waxie has edited and wrote most of TSA's courses with the assistance of the school's President and Vice President for Education. He has six years experience as a notary with a large Miami-based law firm. In addition, he teaches as an adjunct instructor for the Broward University. His courses include Art History of Western Broward County, and Art through the Eyes of the Beholder.

   e. *activity in trade and professional associations, unions, and professional writing ("Active")*

      Mr. Waxie is a member of the United States Notary Society (USNS), a

member of the Florida Fiction Writers Guild, and a charter member of the Western Broward County History Society, and serves as its long-standing president.

3. *To what extent are department heads involved in upgrading educational materials, equipment, and services.*

   As a key department head, Mr. Waxie is involved in every aspect of the upgrading of educational materials.

D. Instructors

Standard: The institution has a sufficient number of qualified instructors to give individualized instructional service to each student.

1. *Give names, positions, qualifications, and resumes of all academic / instructional staff and faculty.*

   Instructors: (not included with this Final Examination).

2. *Explain how instructors assist in developing and updating course material.*

   Instructors work closely with Mr. Waxie on new and revised course materials. They do this by offering suggestions for changes, additions, or deletions. They also review both new and revised course materials.

3. *Explain how faculty are used in the distance education portion of courses, i.e., exam grading, telephone consultation with students, academic counseling, course revision, development of study guides, etc.*

   Instructors are the student's primary contact with TSA. A toll-free 888 telephone number appears on all assignments to encourage students to consult their instructor. Students can also contact their instructors by fax, E-mail, or traditional mail. Instructors advise students on course subjects, program requirements, academic records, and administrative matters.

4. *If outside faculty are used, explain how they are supervised.*

   TSA does not use outside faculty.

5. *List the ratio of qualified instructors to active studying students, by course.*

Course Title	Teacher to Student Ratio
International Accountancy	1:280
Internet Accountancy	1:314
Basic Accountancy	1:574
Advanced Accountancy	1:386

6. *Describe any use of outside faculty, consulting faculty, technical advisors, researchers, subject matter specialists, general consultants, or other such individuals retained by the institution.*

   See Items II. A. 3., II. C. 4., and II. C. 5.

7. *Describe the contractual arrangements with the above groups, amount and type of service rendered, and the method of compensation given. Provide samples of contracts for such personnel.*

   The School's Advisory Group members are paid a per diem for their service equal to one week's wages (before taxes). The average per diem ranges between $2,500 to $4,400 annually. Sample agreements are contained in Exhibit X (not included with this Final Examination).

8. *Describe the stated policies and criteria for staff and faculty employment.*

   Position requirements for an instructor at TSA are: They must—

- be a Graduate of an accredited college or university, with a minimum of a bachelor's degree, or have 5 or more years work in accountancy;
- have the ability to use and apply effective oral communication and interpersonal skills; and
- be proficient with the English language for written communication, and Spanish for the instructors in our Spanish language division.

9. *Submit copies of policy manuals that have been prepared for the guidance of instructional staff.*

   See *TSA Procedure Manual*, Exhibit X (not included with this Final Examination).

10. *Describe any staff development and tuition assistance programs.*

    New TSA instructors are assigned to a senior staff member for mentoring for a period of 6 months. They are closely monitored by the senior staff member and school administration. All of TSA courses are available to instructors at no charge.

11. *Describe how faculty are evaluated for job performance.*

    Instructors are evaluated for performance on telephone presentation, ability to answer written questions, and professional demeanor. TSA has an annual performance evaluation/salary review.

VII. Admission Practices and Enrollment Agreements

Summary of Standards: Institution carefully screens students for admission.

A. Admission Practices

Standard: The admissions practices of the institution fully conform to the provisions of DETC Business Standard II B [changed 1/96].

1. *Explain student admission requirements (by course).*

   Admission requirements are the same for all courses: Students must have a high school diploma or GED. (See exceptions in Item 3.)

2. *Describe the required age, previous formal education, occupation, and other related work experience of students.*

   The general age guideline is 17 years of age. (See exceptions in Item 3.) There is no requirement as to occupation or work experience.

3. *Explain the institution's policy respective to admitting students still in high school or students within compulsory school age.*

   Students are admitted if they are still in high school only upon approval of a parent or guardian, with concurrence by the high school guidance counselor and principal.

4. *If a specific education level is required, explain how it is determined and if any exceptions are made.*

   The student must state on their enrollment application that they are a high school graduate. In some circumstances an applicant may be enrolled while they are still in high school—see Item 3.

5. *Describe how educational qualifications are documented (e.g., diploma or transcript).*

   The applicant must indicate on their enrollment application that they are a high school graduate, and send in a copy of either their high school transcript, GED certificate, or high school diploma.

6. *Explain how admissions requirements reflect the rights of students respective to discrimination against an individual because of race, sex, color, or national origin.*

   TSA admits students of any race, color, sex, religion, or national and ethnic origin to all the rights, privileges, programs and activities generally accorded or made available to students of the school. It does not discriminate on the basis of race, color, sex, religion, or national and ethnic origin in administration of its educational policies, and admissions procedures. This statement is printed in our catalog, and is made available to all prospective students requesting it.

   See Catalog, Page XX, Exhibit X (not included with this Final Examination).

7. *Describe any policies and procedures used in evaluating previous academic work and any policies that permit students to receive credit for previous studies or work experience.*

   Students do not receive credit for previous academic work, studies, or work experience.

8. *Provide evidence that students who meet the minimum admission standards can achieve the announced objectives of the course.*

   Students enrolled in the TSA courses will find that the written material

has been developed at the 9th grade level (as verified by the Waxie/ Skyhouse formula). Students with a high school diploma, or GED, have no trouble understanding the material and meeting the course objectives.

9. *Explain how admissions criteria is in consonance with advertising statements and promotional literature for the course.*

   Admissions standards are not discussed in advertising.

10. *Tell who determines acceptance standards and who determines final acceptance in marginal cases.*

    Admissions standards are established by the President of the School.

11. *Explain what controls ensure that the admissions policy is consistently and uniformly applied.*

    The Vice President of Marketing, Ivan Miser, informs the Education Sales Representatives, who are independent contractors, of School policy. The Registrar's staff are fully aware of the entrance requirements and monitor for any discrepancies. The Registrar has the authority to make decisions in marginal cases as stated in Item 10. All marginal/exceptional cases are documented in the student's education file on the computer.

12. *Describe the principle reasons why students may be rejected or disenrolled by the institution.*

    Rejections are rare, probably because the TSA Catalog and our Sales staff inform applicants of entrance requirements. The primary reason for rejections, however, is that the student has not completed high school.

13. *Explain the policies and procedures for informing prospective students of any requirements for governmental or other licensing procedures that apply directly or indirectly to the particular areas served by the institution's courses.*

    Students enrolled in the Advanced Accountancy course are informed of the requirements for the Certified Public Accountant (CPA) certificate.

B. Enrollment Agreements (Contracts)

Standard: The written agreement and/or other written documents left with the student specify clearly the nature and scope of the course, the services and obligations to which the institution is committed, and the privileges and obligations, financial and otherwise, of the student. Any changes in tuition, procedures, or rates must be made applicable to all future enrollees. The institution must use a written enrollment agreement that conforms to the provisions of DETC Business Standards II A and II B [added 1/96].

1. *Supply sample copies of enrollment agreements (contracts).*

   See sample enrollment agreements, Exhibit X (not included with this Final Examination).

2. *Submit copies of any affirmation forms, telephone verification scripts, or other forms used to process student applications or contracts.*

   We do not use scripts or affirmation forms. Enrollment information is taken by the Sales Associate. They prepare an enrollment application form similar to those printed in the catalog. Copies of the enrollment applications are included under "Enrollment Forms" in the *Sales Training Manual*, Exhibit X (not included with this Final Examination).

3. *Describe the procedures for transmitting a copy of a contract to a student and for handling any down payment.*

   Staff in our Registrars Office verify the enrollment data, assign a student number, enter the student's name and registration information into the computer, and produce a contract. The contract is printed and assembled with the remainder of the introductory package. All of this goes to the Shipping Department, where it is added to the first course shipment. All courses are sent by U.S. Mail, (bulk rate).

   After the course is shipped, the Accounting Department, headed by Mary Bleedingheart, prepares the first statement, which is mailed after the course is shipped.

4. *Describe how sales representatives handle any registration or tuition receipts, and describe procedures used to monitor such practices.*

   Sales Associates take enrollments by telephone, mail, and fax. Credit card information and checks are forwarded to the Registrar's office for processing. All other billing and receiving is done directly by the Accounting Department.

5. *Describe how the cancellation and settlement policy as printed on the enrollment contract is in conformance with the DETC Business Standards.*

   TSA's refund policy meets the requirements of the Florida Education Code (FL. 1212 (f) of Chapter 314 Part 59) which somewhat mirrors the DETC's refund policy.

VIII. Advertising and Promotional Literature/Control of Recruitment Personnel [changed 1/96]

Summary of Standards: Institution advertises its courses truthfully and has adequate control of its sales or recruiting personnel.

A. Advertising and Promotion

Standard: All advertising, promotional or recruitment activities of the institution fully conform to DETC Business Standard I A [changed 1/96].

1. *Describe the advertising and promotion programs of the institution, and explain who is responsible for the philosophy and techniques used in the preparation of advertising copy.*

   Ms. Marie Media, Marketing Director, coordinates TSA's advertising. To generate prospects, we display information at local accounting meetings, including the annual *Florida Accountant's Gala,* and the *Eastern Caribbean Accounting Congress*. Ms. Media is responsible for preparing all publicity, and the President of the School must approve it prior to release.

2. *Describe how documented testimonials are used.*

   The School does not use testimonials.

3. *Explain how referrals are sought fr m students.*

   Referrals are encourage from students, and a $100 "finders fee" is credited to the student's account for every referred student enrolling and completing at least 25% of the course.

4. *Explain any discounts, premiums, or cash awards made to individuals who refer other prospective students.*

   See Item 3 above.

5. *Tell who is responsible for ensuring that all advertising is consistent, true, and that it correctly represents institutional and course objectives, as well as admissions requirements.*

   Ms. Media, along with the School's President, is responsible for ensuring that all advertising is consistent, true, and that it correctly represents institutional and course objectives, as well as admissions requirements.

6. *If sales representatives/agents are permitted to place advertising which they develop, explain the procedures used to ensure compliance with applicable business standards and regulations.*

   No sales representatives may place TSA advertising.

7. *If outside advertising agencies are retained, explain how the advertising copy is reviewed and controlled by the institution.*

   TSA Enterprises, Inc., places all ads for the School. It is a wholly owned company controlled by the School President, so all advertising copy and creative control remains with TSA.

8. *Supply copies of all printed advertisements, radio and TV scripts, and mailing pieces used within the last 12 months to invite inquiries from prospective students or inform prospective students of institution programs. (Two sets of promotional devices such as videotapes or TV ads on videotape may be submitted with the SER. These items should also be on display and available for viewing during the on-site visit.)*

   See advertisements, Exhibit X (not included with this Final Examination).

9. *Supply copies of any institutional advertising materials in use to inform particular occupational groups, employers, other educational institutions, or the general public of the courses and services offered.*

   TSA does not use this form of advertising.

10. *Supply copies of all sales letters, printed materials, and catalogs mailed or delivered to individuals on a direct mail basis or in response to inquiries from prospective students. To ensure conformity with the DETC Business Standards, refer to Appendix F.*

    See direct mail advertisements, Exhibit X (not included with this Final Examination).

11. *Describe how advertising and promotional budget figures are established for any given period, and explain what percent of the school's total operating budget is used for advertising and promotional purposes.*

    The advertising and promotional budgets are established annually by the President/CEO based on advice from the TSA staff.

12. *Give examples of advertisements and promotional literature which include the full and correct name and location of the institution and disclose the fact that correspondence/distance education is given.*

    See exhibits supplied for Items 8, 9, 10, Exhibits X (not included with this Final Examination).

B. Control of Recruitment Personnel [changed 1/96]

Standard: The institution's policies and practices in the hiring, training, monitoring, and managing of all sales or recruiting personnel fully conform to DETC Business Standard II C [changed 1/96].

(This section is intended for use by institutions with recruiting personnel, sales representatives, agents, telemarketers, or any other person or service whose role is to recruit students with or without compensation by the institution.)

1. *Describe any direct mail, telemarketing, or other marketing methods.*

   TSA's marketing efforts are limited to returning calls to individuals who have contacted the school previously by phone, or in writing responding to an national or international advertisement.

2. *Describe the screening and selection procedures used in recruiting sales representatives.*

   Sales associates are contract employees of TSA and are chosen based on their background, qualifications, and strengths in the areas of success at telemarketing, and written and oral communication.

3. *Describe the training program for sales representatives and how the program meets all DETC requirements.*

   Sales associates are trained in telephone techniques and etiquette. They are also given training via a pre-employment seminar developed by TSA covering all legal requirements of the states in which we are licensed or do business, and now in the requirements of the DETC. Sales associates must complete a final examination with a "passing" score of 80%, or higher, before they may represent TSA.

4. *Describe the training and supervision process of any other outside agencies or persons (other than institution's sales personnel) used to solicit prospective students.*

   The only people who solicit prospective students are TSA contract employees or full-time TSA staff members.

5. *If sales representatives are employed, answer the following:*

   a. *Number of sales personnel*

      There are ten contract education sales associates and Mr. Ivan Miser, a graduate of Walden Pond School of Marketing (WPSM), and the TSA Vice President for Marketing. He is a certified and licensed private school marketing representative (FL#98-45123x).

b. Number that are full time—institution provides sole source of income

Mr. Ivan Miser is a full-time TSA employee, the other sales associates are contract employees.

c. Title used to designate sales personnel

TSA Education Sales Associate.

d. Average length of service

The average length of service is .075 years.

e. Average annual income

The average annual income is $58,500.

f. Maximum income

The maximum is currently $136,000.

g. Minimum income

The minimum income is $22,000.

6. *Provide copies of any studies and/or records of school trends in compensation levels, turnover, supervisory ratio, number of complaints arising from agent discharge, etc.*

Over the past two years TSA, based on the recommendations of the State of Florida's Private School Sales and Marketing Judiciary Board, has discharged 6 sales representatives. One person left the company to accept a different position.

7. *Explain how the sales representative's written agreement with the institution spells out the rights and provisions of both the institution and the sales representative. Supply copies of specimen written contracts with sales representatives.*

We have written agreements with contract sales associates, see Exhibit X (not included in this Final Examination).

8. *Describe the policies and procedures used to license and bond sales personnel in the various states.*

   We do not license or bond sales personnel.

9. *Explain how sales personnel are informed of and kept up-to-date on changing federal and state laws.*

   Mr. Miser keeps the contract sales associates informed of any changes.

10. *Provide a complete description of all the sales representative compensation plans used.*

    All contract sales associates are paid based on the salary schedule indicated in Exhibit X (not included with this Final Examination).

11. *If sales supervisors are used, report on the number of such supervisors and the number of persons whom they manage.*

    There is one manager, Mr. Ivan Miser, with a staff of ten contract sales associates.

12. *If the sales organization is large, describe what controls are used to ensure the ethical conduct of sales personnel.*

    Not applicable.

13. *If the institution has a sales organization, give the following information for each office in the sales organization:*

    There is no separate office of sales organization. Not applicable.

14. *Supply copies of current sales manuals provided sales representatives and letters and bulletins furnished for their guidance. Include copies of all training manuals provided to supervisors and any other sales aids (charts, recordings, or "pitch" books) provided to sales personnel for use in sales presentations.*

See *Tollin School of Accountancy Education Sales Department Training Manual*, Exhibit X (not included with this Final Examination).

15. *Describe the training programs used by the school for newly employed sales personnel.*

    New employees undergo the sales training program outlined in Item 3 above.

16. *Explain any policies and procedures used to monitor and control the actions of sales personnel.*

    All training for new employees is monitored by Mr. Miser, with the school's President/CEO taking an active role in training the contract sales associates.

17. *Show evidence that each sales representative clearly understands and takes seriously the Code of Ethics for Sales Representatives of the DETC (see Appendix F).*

    TSA is beginning to take the *DETC Code of Ethics* for sales representatives very seriously. Mr. Miser has instructed each sales representative to completely follow "every word" of the Code of Ethics. He has indicated that he is watching each sales representative for any Code violation.

18. *Provide the percent of turnover for the institution's sales force in the past two years, and state what the average length of service is for sales personnel.*

    All contract sales associates average 0.75 years of service. Two sales associates have been in the department for one and one-half years. One person, the newest employee, has been with TSA for two months, and is already one of the highest paid contract sales representatives. At his current rate of enrollment, his income is projected to be between $90,000 and $100,000 for his first year with the school.

IX. Financial Responsibility

Summary of Standards: Institution is financially able to deliver high quality educational services.

A. Financial Practices

Standard: The institution shows, by complete, comparative financial statements covering its two most recent fiscal years [changed 1/96], that it is financially responsible and that it can meet its financial obligations to provide service to its students. (Financial statements must be prepared "in conformity with generally accepted accounting principles.")

1. *Submit copies of the institution's, or in the case of corporate-owned institutions, the parent's, comparative annual financial statements for the last two fiscal years. Financial statements must be prepared "in conformity with generally accepted accounting principles." This includes the use of the* ***accrual method of accounting****. If the parent's financial statements do not include operating statements for the institution itself, separate school statements should also be included.*

   See Audited, Consolidated Financial Statements (not included with this Final Examination).

2. *Submit a copy of the Teach-Out Commitment using the appropriate form in Appendix G (3 or 4) executed by the ultimate owner or corporate entity accepting all obligations for the fulfillment of agreements made with students.*
   See "Corporate Resolution," Exhibit X (not included with this Final Examination).

3. *Describe the budget-making process used by the institution.*

   Tollin School of Accountancy, Inc. is organized into 4 budget centers: administration, sales and marketing, student services and supplies, and miscellaneous. Each of these have individuals assigned the responsibility of preparing and managing the budget. The President/CEO reviews each to ensure they meet the goals of the school to provide quality services to students, and to ensure the financial stability of the institution.

4. *State if the current assets are sufficient to meet the current liabilities and describe any cost control / analysis systems used.*

   The current assets of the School are probably sufficient to meet all current liabilities.

5. *Describe what reserves are kept for honoring future obligations and bad debts.*

   On an annual basis, the School reviews, with the auditors, the reserve for bad debts and records the necessary amount to cover all potential bad debts. The School has a comprehensive credit and collection department that follows up on all delinquent accounts. Additionally, the School, 5 months out of the last 12 months, has maintained sufficient cash flows to satisfy any obligations that arise from its ordinary course of business.

6. *Explain how the accounts payable (numbers, amounts, and age) reflect sound financial responsibility and management.*

   All accounts payable are satisfied within 120 days of receipt.

7. *Describe how inventories of course materials are adequate for current and future servicing requirements.*

   In order to provide maximum service and support for our student-base, the Supply Manager, Judith Pencilcounter, utilizes a complex system, that only she understands, in tracking inventoried materials, and in projecting needs for the coming month. Ms. Pencilcounter, meeting monthly with the school President/CEO, determines the production requirements for the coming 30 days, and ensures that all projected student and school needs are taken into consideration.

8. *Describe the extent and allocation of insurance coverage.*

   The School carries comprehensive commercial insurance policies on its property, facilities, equipment, and human resources which include: general liability, umbrella package, tenant users' liability package, overseas liability package, select bond insurance for education purposes. In addition, the School provides coverage for its employees with policies that

cover workers' compensation, medical, dental, optical, life, directors & officers liability, fidelity, employment practices liability, and professional liability.

The wholly owned company, TSA Enterprises, Inc. (a registered insurance company in the Bahamas), carries all insurance coverage maintained by the School. TSA Enterprises, Inc., and its insurance division, ABATS International, have offices in Nassau, Granada, Kingston, and Costa Rica. This company is unrated by the A.M. Best Company, Inc.

9. *For an institution with resident training program(s), explain what liability coverage exists for students at resident training sites.*

   Not applicable.

B. Demonstrated Operation

Standard: First time applicant institutions can document continuous sound and ethical operations in all respects. Applicant institutions must document two consecutive years of sound and ethical operation as a bona fide distance education institution [changed 1/96].

1. *Describe how the institution has achieved two years of sound financial and ethical operation.*

   TSA, while starting small, has evolved into a major school of accountancy in the nation. Its 400 national and international students are successful in studying in the areas in which they are enrolled. The School has operated successfully for three years, beginning with an enrolled class of 4 in the basic accounting classes. During the second year, and the first year that it was approved for scholarship assistance from the State of Florida, it enrolled 150 students. Its current enrollment is 400, with projected enrollments next year of some 1,500 students nationally and internationally.

2. *Supply evidence and documentation which demonstrates two consecutive years of sound and ethical operations.*

   See Item IX. B. 1.

X. Tuition Policies, Collection Procedures, and Refunds

Summary of Standards: Institution has fair and equitable tuition and refund policies.

A. Tuition Policies

Standard: Tuition policies are in keeping with the provisions of the DETC Business Standards Section III A.

1. *State whether the total course price is the same for all persons at a given time (except for allowable discounts). Provide samples of discounts used in the past 12 months.*

   The total course price is the same for all prospective students.

2. *State if price discounts have a published termination date.*

   Not applicable.

3. *Explain how any aptitude tests and student contests are administered.*

   We do not use aptitude tests and contests as marketing and promotion tools.

4. *Describe any scholarship programs, and indicate the sources of funds and who makes the selection of recipients.*

   TSA has no scholarship funds.

B. Tuition Collection Procedures

Standard: Tuition collection practices and procedures are fair. They encourage the progress of students and seek to retain their good will. The right to protect its financial interests is inherent with any accredited institution. Its tuition collection practices are in keeping with sound and ethical business standards.

1. *Describe in detail the policies and procedures for the institution's collection of tuition.*

TSA, through its parent company, TSA Enterprises, Inc., collects delinquent tuition accounts, and reports to credit reporting agencies the names, addresses, and amounts of delinquency. Harry P. ("Junior") Tollin, Jr., is the manager of the bad debts division. This division is charged with collecting all delinquent and bad debts for the company. The division has successfully sued in various state, federal and international courts for debt collection. It has recouped over $1 million (US) over the past 3 years from "dead beats" owing the company money. See collection procedures and letters in Exhibit X (not included with this Final Examination).

2. *State if collection notices, forms, and telephone scripts used by outside collection agencies conform to ethical business practices.*

   We believe that TSA Enterprises, Inc. does meet the standards for collection agencies. It conforms to the Standards of Ethical Practices of the In-House Collection Agency Association (IHCAA), of which it was a charter member.

3. *Explain how collection practices encourage the student to proceed with the course.*

   See Item B.1. above.

4. *Supply a complete set of **all** sample notices and collection letters used by the institution.*

   See sample collection letters in Exhibit X (not included with the Final Examination).

5. *If outside collection agencies are used, state the percentage of accounts that are turned over to such agencies.*

   Based on figures from last year, approximately 64.87% of all accounts are referred to TSA Enterprises, Inc. for collection.

6. *Provide the name and address of each agency used, and provide copies of the signed contracts with each agency and the procedures used by them.*

TSA Enterprises, Inc., 11515 West Commercial Boulevard, Fort Lauderdale, FL 33301. See signed contracts in Exhibit X (not included with this Final Examination).

7. *Enclose a complete set of forms and collection letters used by each agency.*

   See set of collection forms and letters in Exhibit X (not included with this Final Examination).

8. *Provide a sample of the written ethical standards furnished by the institution to any outside agencies.*

   See the *Standards of Ethical Practices* of the In-House Collection Agency Association (IHCAA) in Exhibit X (not included with this Final Examination). For further information on the standards contract the IHCAA at 1515 West Commercial Boulevard, Fort Lauderdale, FL 33301, Ms. Susie M. Tollin, Executive Director.

9. *Explain how the institution monitors the outside agency's adherence to these standards.*

   The school's President/CEO is responsible for monitoring the outside collection agency's adherence to the IHCAA and the DETC standards.

C. Tuition Refund Policies

Standard: The institution recognizes that there are legitimate reasons why enrolled students may not be able to complete their training with benefit to themselves. Accordingly, the school has a policy for equitable tuition adjustment in such cases. Records are maintained on tuition refunds and enrollment cancellations to provide a reference source for management analysis.

1. *Describe the policies and procedures used in the settlement of students' accounts in cases where there are legitimate reasons why the enrolled students may not be able to complete the course with benefit to themselves. Also, show how the institution's cancellation and settlement policies meet the minimum requirements of the DETC Accrediting Commission.*

TSA's refund policy is at least as generous (and usually more generous) to the student than that of the DETC policy. For example, we round the refund percentage to the nearest one percent, where DETC and federal policies round the refund down to the next lower ten percent.

If a student has completed more then 45 percent of the course, we keep all of the tuition. It they have completed less than that we compute the refund in accordance with the Florida Private School Refund Requirements. We first calculate the amount of tuition used by the student. We subtract that from the tuition amount paid by the student to determine the refund. To calculate how much of the tuition the student has used, we multiply the total tuition by a fraction. The numerator is the number of the assignments they've completed. The denominator is the total number of assignments in the course. We subtract the tuition used from anything the student has already paid. The remainder is the refund due the student.

If, for example, the student paid $1,000 for a ten-assignment course, but had only finished two assignments, the calculation would look like this: $1,000 x 1/5 = $400. That's the amount of the tuition the student has used. This student would be entitled to a $600 refund, less a "processing fee" of 33%. The former student would receive a $400 refund.

2. *Explain how refunds to students are made within 30 days after date of request and where it is stated that a student may cancel "in any manner."*

   The administration staff processes refund requests each third Friday. Accounting receives the request that same day. Processing, check printing, and mailing takes less than 30 days, with checks released to the students 30 days after the checks are printed.

   Florida Education Code, Chapter 9, Division 110, Article 2a, Section 94 (d) (1) states that ". . . The institution shall advise each student that any notification of withdrawal or cancellation and any requests for a refund must be made in writing. . . " Therefore we cannot state that refund requests can be made "in any manner." Students must request refunds in writing. Further, TSA's catalogue requires students to include the words: "Under Florida Education Code, Chapter 9, Division 110, Article 2a, Section 94 (d)(1), and being a student at TSA, I hereby request a refund of all unused tuition, be

paid to me, minus the processing fee." Refund requests without these statements are ignored.

3. *Explain how the institution handles a student who has paid in full but no longer wants to submit lessons for grading but wants all the materials.*

   If a student has paid tuition in full and requests all course materials, they will be sent.

4. *For the 12 month period covered by enrollments and completions represented in your table of School and Course Data (Institutional Summary Profile), please compile a table listing these statistics for each course:*

   See Exhibit X (not included with this Final Examination).

5. *Show your refund schedule and how refunds are calculated. For example, what would be the refund due a student who had just completed the third assignment in a 12 assignment course? What about four assignments or five or six or none?*

   See Item C.1. above, these calculations would be consistently used in these cases.

6. *Highlight and show where the refund policy is stated on the enrollment agreement.*

   See sample enrollment agreement, Exhibit X (not included with this Final Examination).

7. *List all legal actions or other formal investigations initiated against the institution by students or any agencies during the last five years, because of refund or other financial issues, and indicate briefly the current status and/or disposition of each. Also list any legal actions initiated by the institution.*

   There has only been 15 student or government-initiated investigations, complaints, legal or regulatory actions against the Tollin School of Accountancy regarding refunds or other financial issues within the past two years. Each of these has been successfully settled to the satisfaction of the School.

8. *List any Federal Trade Commission, state, or other government investigations or actions taken against the institution in the past five years.*

   There has not been any government-initiated investigation or regulatory action taken against the Tollin School of Accountancy within the past three years.

9. *Provide dates, course, and current disposition of each action above.*

   Not applicable.

10. *State if the institution operates under any federal or state consent decrees or orders or voluntary assurances of compliance. Describe fully.*

    TSA is not operating under any federal or state consent decrees or orders or voluntary assurances of compliance. TSA Enterprises, Inc. (the parent company) does have a federal consent degree not to engage in operations involving any federal agricultural set-asides in the future.

XI. Plant and Equipment

Summary of Standards: Institution has adequate facility, equipment, and record protection.

A. Plant and Equipment

Standard: The building, workspace, and equipment comply with local fire, building, health, and safety regulations and are adequately equipped to handle the educational program of the institution.

1. *Provide a photograph of the exterior view of the institution, or indicate where such a photograph may be found in the supporting materials. (Please note: include in the SER clear driving directions to institution locations for use by members of the Examining Committee.)*

   See photo of the TSA Building in Fort Lauderdale, Exhibit X (not included with this Final Examination).

2. *Describe the type of construction, special features, and compliance with local fire, building, and occupational health and safety regulations.*

TSA's main building is located on a 3.00 acre plot at 11515 West Commercial Boulevard, Fort Lauderdale, FL. The building encompasses approximately 33,00 square feet and houses our executive offices, instructional and administrative staff facilities, and Student Services divisions. The parent company, TSA Enterprises, Inc., has an office at this location. The building meets construction requirement's (pre-Hurricane Andrew) for buildings located in Broward County, Florida. TSA Enterprises, Inc. plans to upgrade this building within the next 10 years to current code compliance requirements for remodeled structures.

3. *Provide a basic floor plan indicating the occupant/activity in each area, and explain how workspace is satisfactory, hygienic, and safe.*

   See Exhibit X (not included with this Final Examination).

4. *Describe any special purpose equipment, first aid equipment, computers, records systems, or other technology used, and indicate which equipment is owned or leased.*

   Information not included with this Final Examination.

B. Record Protection

Standard: Educational records of all students are maintained in a safe, fireproof, and reasonably accessible place as long as they are likely to be needed. Other records are maintained in accordance with current educational, administrative, business, and legal practice.

1. *Describe the organization and management of the administrative office.*

   See "Corporate Organizational Chart," Exhibit X (not included with this Final Examination).

2. *Describe how long student educational records are kept and how they are kept legible and accessible.*

   Student records are stored on a 20-year old IBM 360 computer, and are accessible via the LAN for inquiry and maintenance. Hard-copy enrollment agreements are retained for at least five years.

3. *Describe the type of equipment used to protect vital records.*

   Education and financial records are kept on the IBM 360 computer; backup copies, which are made nightly, are kept in a fireproof safe in Mr. Tollin's office.

4. *Explain how educational and financial records are maintained, stored, and retained.*

   Financial records are maintained for three to seven years, depending on state statutes of limitation. Certain financial records are kept indefinitely. Storage is the same as for the education records.

5. *Explain how the records are protected from vandalism, theft, damage, or fire.*

   In addition to the security measures discussed in Item 4 above, unauthorized access to computer is guarded against by an entry password security scheme that is so effective that some of TSA staff have yet to figure it out.

XII. Research and Self-Improvement

Summary of Standards: Institution conducts continuous research and self-improvement studies.

A. Research and Self-Improvement

Standard: An accredited institution shows evidence of progressiveness and of effort to improve operating efficiency and service. Sound research procedures and techniques are used to measure how effectively the announced course objectives are being met.

1. *Describe any systematic research, evaluation, and quality controls carried on for institutional improvement.*

   TSA's Advisory Board annually evaluates all of our programs and makes recommendations for changes and upgrades.

2. *Explain what research is conducted or what information is systematically collected.*

   See Item 1 above.

3. *Explain how the institution assesses the outcomes of its programs and services.*

   See Item 1 above. In addition, we engage in student surveys as indicated in an earlier section of this SER.

4. *Describe any analytical studies of students in terms of their progress, characteristics, background, etc.*

   See Item 3 above.

5. *Submit any other material or data giving evidence of present efforts to extend and/or improve the institution.*

   See Exhibit X (not included with this Final Examination).

6. *Describe the institution's library.*

   The Tollin School of Accountancy maintains the Harold P. Tollin Library at its headquarters in Fort Lauderdale. The Library is located in the President's Office and has 100 reference books, appropriate literature and magazines, as its core library resources.

B. Revision Practices

Standard: Effective procedures are used to constantly improve materials and keep them current and up-to-date.

1. *Explain what procedures are in place to monitor course materials' currency and accuracy.*

   Mr. Arnold C. "AC" Waxie revises TSA courses on a regular basis (see prior section on Authorship for course revision schedule).

2. *Explain how the quality of instruction, student service, and student satisfaction are evaluated.*

Our Education Director, Prudence I. Tollin, monitors all new and current instructors and staff. Student satisfaction is determined by surveys, previously described.

3. *Describe how the results of the evaluations are acted upon to improve course materials and services.*

   The School's President/CEO discusses all evaluations with the Education Director to determine any curricular changes needed.

C. Professional Growth

Standard: Interest in improving the course of instruction and in the upgrading of personnel and faculty is demonstrated through membership in professional associations, review and application of research, and practical experience in the general field of education and the specific field of correspondence / distance education.

1. *Describe professional organizations with which the staff is affiliated, and explain their involvement with each.*

   All TSA instructors are members of appropriate professional organizations. Many belong to the Alumni Association of the New University College of the Central Caribbean (NUCCC).

2. *Explain how the staff is active in Distance Education and Training Council activities.*

   Instructors are kept apprised of DETC events through the Director of Education and School President/CEO.

3. *List the names of staff and the relevant professional meetings they have attended for the past two years.*

   See Exhibit X (not included with this Final Examination).

4. *State what training and self-development efforts are sponsored or are encouraged by institution management for the professional development of school staff.*

   TSA encourages all employees to enroll in our courses.

5. *Describe any in-house training programs for staff.*

   See Exhibit X (not included with this Final Examination).

D. Self-Study Program

Standard: An accredited institution has an established program or plan reflecting a desire to improve its services to students and to provide for the growth of the institution and its staff and faculty.

1. *State if the institution has a written plan or program for its short- and long-range development, improvement, or expansion of the curriculum or services to its staff and faculty. Include a copy of the plan or provide a summary of it.*

   See Exhibit X (not included with this Final Examination).

2. *Explain how the plan provides adequate and realistic growth of the institution and staff.*

   See Exhibit XX (not included with this Final Examination).

E. Summary of Institution Problems and Future Plans

1. *As candidly as possible, describe the significant challenges currently facing the institution. State how the process of DETC self-evaluation has helped clarify/identify any major issues or problems.*

   TSA has found development of the SER not only informative, but beneficial in identifying challenges of the School. We plan on using the SER process to help the School grown and change to meet the demands of the international accountancy area.

2. *Describe what plans have been developed for solving these problems.*

   See Item 1. above.

3. *Describe major institutional changes and improvements made since the last accreditation examination of the institution.*
   Not applicable, first request for DETC accreditation.

4. *List, in order of importance, those innovations considered particularly worthy of notice by the Examining Committee.*

   Identification of new methods of determining revenue. And development of additional courses to offer to international students.

5. *Discuss in what ways the institution has contributed to the overall advancement and enhancement of the field of distance education and training.*

   Not applicable (we think).

6. *State what problems, actions, or policies should be emphasized to the visiting evaluators as examples of significant institution achievements in quality distance education and training.*

   TSA's efforts in providing its students an excellent professional education are well documented by the information contained in this SER. We look forward to having full accreditation by the DETC Accrediting Commission, as a recognition of our excellence in distance education.

7. *Explain what are the major strengths and weaknesses of the institution.*

   The administrative staff of TSA has not identified any weaknesses in the school, or in its operation, as a result of this SER process. We believe that our success in distance education speaks for itself.

8. *Describe any trends and/or patterns within the institution which demonstrate the overall quality of the institution.*

   As stated earlier, the students enrolled in TSA, and the Advisory Board, both indicate the overall quality of our education. We stand on those evaluations as proof that we are one of the premier schools of accountancy in this country.

9. *Share any comments on the process of self-evaluation or accreditation the institution would care to offer, and list any suggestions for improvement.*

   We have no comments at this time.

10. *List any additional questions for the Guide to Self-Evaluation that would help present the merits of the institution.*

    We feel we have had an ample opportunity to present the merits of TSA, and do not believe more questions would be of benefit.

11. *List/identify those questions which could be modified or deleted in the Guide.*

    We have no comments at this time.

DETC Evaluator Training Course

Final Examination

The following Final Examination consists of 40 multiple choice questions (worth 2 points each) and 5 essay questions (worth 4 points each). Please mark your answers on the "Final Examination Answer Sheet" found on page 253, and write your answers to five essay questions and send it to Susan M. Reilly, DETC, 1601 18th Street, NW, Washington, D.C. 20009.

Instructions

Select the correct or proper responses from the ones presented.

1. Is the overall "look" of the SER correct to DETC standards as required by the ***DETC Accreditation Handbook***?

    a. Yes, the SER closely follows the standards of the DETC.

    b. No, the SER does not follow the DETC standards.

2. Could you locate TSA on the map provided by the school?

    a. Yes

    b. No

3. Is the "**Board of Advisors**" to TSA explained well enough in the SER for you to understand their role and responsibilities in the operation of the school and evaluation of the curriculum?

    a. Yes, sufficient information is contained in the SER to make this determination.

    b. No, there is not sufficient information in the SER, and additional follow-up must be made during the school visit.

4. Does the education sales Vice President of Marketing, Ivan Miser, appear to have the proper credentials for the position that he holds?

    a. Yes, sufficient information is contained in the SER to indicate that he has the credentials for this position.

    b. No, there is not sufficient information in the SER, and additional follow-up must be made during the school visit.

5. Does the information submitted by TSA meet the requirements of the DETC for specifying the ownership of the school?

    a. Yes, sufficient information is contained in the SER to meet this requirement.

    b. No, there is not sufficient information in the SER, and additional follow-up must be made during the school visit.

6. Is it clear from the SER just how many foreign students are enrolled at TSA?

    a. Yes, sufficient information is contained in the SER to decide how many foreign students are enrolled.

    b. No, there is not sufficient information in the SER, and additional follow-up must be made during the school visit.

7. Reading the SER, can you determine if the "legal form" of the school is correct?

    a. Yes, it appears that the legal form is correct.

    b. No, it is not correct, and additional follow-up must be made during the school visit.

8. Does the information submitted by TSA conform with the required information as stipulated in the *DETC Accreditation Handbook* under "Institutional Summary Profile," Section 6, B?

    a. Yes, sufficient information is contained in the SER to meet this requirement.

    b. No, there is not sufficient information in the SER, and additional follow-up must be made during the school visit.

9. Are the course descriptions sufficient for the evaluator to understand the goals and objectives of each course?

    a. Yes, sufficient information is contained in the SER to understand the goals and objectives of each course.

    b. No, there is not sufficient information in the SER to understand each course, and additional follow-up must be made during the school visit.

10. Given the information in the SER, do the educational outcomes appear to be realistic for each course?

    a. Yes, the educational outcomes listed in the SER appear to be realistic for the 4 courses.

    b. No, the outcomes do not appear to be realistic for the courses, and additional follow-up must be made during the school visit.

11. What percent correct is required on each quiz and on the final examination for a student to satisfactorily complete each course?

    a. 80%
    c. 70%

    b. 75%
    d. 65%

12. Based on the information placement information and course completion rates, are graduates from the four courses prepared for occupations in the area of accounting?

    a. Yes, they are prepared for jobs in the areas in which they have received training.

    b. No, they are not prepared for the jobs in the areas in which they are trained.

13. Are the course revision standards of TSA at an acceptable rate?

    a. Course revision schedule is acceptable.

    b. Course revision schedule is unacceptable.

14. Based on the information contained in the SER, do Mr. Waxie's credentials as course development specialist appear to be sufficient for him to carry out this function?

    a. Mr. Waxie's credentials are sufficient for him to be a course development specialist.

    b. Mr. Waxie's credentials appear not to be sufficient for him to be a course development specialist.

15. Is the Waxie/Skyhouse formula appropriate for measuring reading and course difficulty skills?

    a. The Waxie/Skyhouse formula is appropriate for measuring reading and course difficulty skills.

    b. The Waxie/Skyhouse formula may be inappropriate for measuring reading and course difficulty skills, and additional information is needed on the formula.

16. Based on the Waxie/Skyhouse formula, do the reading levels for the four TSA courses appear to be realistic for the audiences of the courses?

    a. Based on the formula, the reading levels appear to be appropriate.

    b. Based on the formula, the reading levels appear not to be appropriate.

17. Has the school, to your satisfaction, verified that students admitted can read at the proper reading level for the courses?

    a. The school has verified that students read at the proper level for admission.

    b. The school has not verified that students read at the proper level, and additional questions must be asked during the site visit.

18. Does TSA's method of shipping lessons to students encourage or discourage learning?

    a. Shipping method encourages learning.

    b. Shipping method discourages learning.

19. Based on the information in the SER, does TSA prove that its illustrations in its course material meet the DETC standards?

    a. They meet the standards.

    b. They do not meet the standards.

20. As outlined in the SER, do the school's examination development and practices appear to meet the DETC standard?

    a. Yes, they meet the standard.

    b. No, they do not meet the standard.

21. Based on the information in the SER, does TSA meet the DETC standards for handling student inquiries?

    a. Yes, they meet the standard.

    b. No, they do not meet the standard.

22. Does TSA's policy on handling student failure of courses and academic dismissal meet the DETC standards?

    a. Yes, the policy meets the standard.

    b. No, the policy does not meet the standard.

23. Based on the SER, how many months does a student have to complete any TSA course?

    a. 36 months
    b. 24 months
    c. 18 months
    d. 12 months

24. Based on the SER, does TSA adquately demonstrate that the reactions of students are sought for evaluating and improving instructional materials and services?

    a. Yes, TSA adquately demonstrates that information from students is used for evaluating and improving instructional materials and services.

    b. No, TSA does not adequately demonstrate that information from students is used for evaluating and improving instructional materials and services.

25. Based on the SER, is the school using appropriate technology to enhance student learning?

    a. Yes, the school is using appropriate technology to enhance student learning.

    b. No, the school is not using appropriate technology to enhance student learning.

26. Is the turnaround time for grading and returning lessons and examinations reasonable?

    a. Yes, the turnaround time is reasonable.

    b. No, the turnaround time is not reasonable.

27. Based on the information in the SER, does TSA demonstrate that students progress through the courses at a satisfactory rate?

    a. Yes, TSA does prove that students progress through the courses at a satisfactory rate.

    b. No, TSA does not prove that students progress through the courses at a satisfactory rate.

28. What percent of graduates are employed in the accounting field?

    a. 10%
    c. 50%

    b. 20%
    d. 60%

29. Is the director of education qualified for her position?

    a. Yes, the director of education is well qualified for her position.

    b. No, the director of education is not qualified for her position.

30. Is the teacher to student ratio reasonable?

    a. Yes, the ratios are reasonable.

    b. No, the ratios are much too high.

31. Based on the information in the SER, does TSA's admission policy meet the DETC standards?

    a. Yes, it meets the standards.

    b. No, it does not meet the standards.

32. In reviewing the policies and procedures for controlling TSA sales associates contained in the SER, do they appear to meet the DETC standards for controlling of sales representatives?

    a. Yes, they meet the standard.

    b. No, they do not meet the standard.

33. Based on the SER, does the school meet the DETC standard of having two years of sound fiscal operation?

    a. Yes, they meet the standard.

    b. No, they do not meet the standard.

    c. Unsure they meet this standard.

34. Based on the SER, do the school's collection procedures appear to meet the DETC Tuition Collection Procedures?

    a. Yes, they meet the standard.

    b. No, they do not meet the standard.

    c. Unsure they meet this standard.

35. Does the school's refund policy meet the DETC refund policy standard?

    a. Yes, they meet the standard.

    b. No, they do not meet the standard.

36. Does the school meet the 30 day DETC standard for payment of any refund?

    a. Yes, they meet the standard.

    b. No, they do not meet the standard.

37. Does the school's past refund payment litigation record meet the DETC standard for fiscal accountability?

    a. Yes, they meet the standard.

    b. No, they do not meet the standard.

    c. Unsure they meet this standard.

38. Does TSA adequately backup and maintain student records?

    a. Yes, TSA does adequately backup and maintain students records.

    b. No, TSA does not adequately backup and maintain student records.

39. Considering the four courses offered by TSA, is their library adequate and accessible to students?

    a. Yes, TSA's library is more than adequate.

    b. No, TSA's library is not adequate or accessible to students.

40. Based only on the SER, in your opinion, should TSA receive accreditation?

    a. Yes, without any reservations.

    b. No.

Essay Questions

Here are hypothetical situations which could take place (some actually have) on an accreditation visit. For each situation, assume you are an Evaluator appointed to visit and examine a school. Based upon the Standards and Policies of the Accrediting Commission, your professional judgment, and your interpretation of each of these situations, (1) what would your response or action be while at the school, and (2) how would you record your findings in your written report to the Committee Chair?

Answer any five of the following nine questions. Write your answers on the "Final Examination Answer Sheet." Your answers should be only three or four sentences in length.

Situations

1. Data and statements presented in the SER are not supported by documented evidence at the school. In asking school officials about the lack of documentation, you are told that the SER is out-of-date and that what they state to you orally represents the current situation. Still, you find no evidence.

2. In reviewing the SER, you note statements that conflict with other statements in the report. You learn while at the school that different school officials were responsible for different sections of the report, and that the individual officials still maintain differing views.

3. As you begin your check of student records, a school official gives you a large group of files containing the records you have asked to see. In spot-checking these records you note that student progress appears to be ideal.

4. As Chair of an Examining Committee, you stop in the school's conference room assigned to the Committee to pick up your notes. You find a school employee going through your briefcase.

5. You are examining a school that has been accredited for the past 15 years, and you are well acquainted with the school's president. You find several key areas at the school which do not meet the minimum standards. At the end of the day, the president asks you for your candid "off-the-record" opinion on what you found.

6. As Chair of a Committee, you ask the school's president to limit the tour of the school to "10 to 15 minutes." Twenty-five minutes pass and you are only half way through the tour.

7. While at a school, the president vigorously challenges your questions at every turn, and argues that he will "never" do "such and such" because "X" school doesn't do it, etc. His arguments sound quite convincing to you, but they negate the common interpretation of the published Standards.

8. A school official presents you with a newly published Sales Manual but you have some doubts about its adoption and use in the field. There are no students available to interview, and there are no salesmen at the school to talk with. The Sales Manual provided in the SER is not in accordance with the minimum Standards.

9. You have a reservation on a 4:30 p.m. plane, the last flight of the day. It is 3:00 p.m. and you still have about 1-2 hours of work to do before all areas can be covered adequately. You entertain the thought of asking the Chair to "fill in" for you.

Final Examination Answer Sheet

Name: _____

Title: _____

Organization: _____

Address: _____

Telephone Number: _____ E-mail address: _____

I certify that I have read and completed the Final Examination for the DETC Evaluator Training Program

Signature: _____ Date: _____

Multiple Choice Questions

1.	____ a.	9.	____ a.	16.	____ a.	23.	____ a.
	____ b.		____ b.		____ b.		____ b.
							____ c.
2.	____ a.	10.	____ a.	17.	____ a.		____ d.
	____ b.		____ b.		____ b.		
						24.	____ a.
3.	____ a.	11.	____ a.	18.	____ a.		____ b.
	____ b.		____ b.		____ b.		
			____ c.			25.	____ a.
4.	____ a.		____ d.	19.	____ a.		____ b.
	____ b.				____ b.		
		12.	____ a.			26.	____ a.
5.	____ a.		____ b.	20.	____ a.		____ b.
	____ b.				____ b.		
		13.	____ a.			27.	____ a.
6.	____ a.		____ b.	21.	____ a.		____ b.
	____ b.				____ b.		
		14.	____ a.			28.	____ a.
7.	____ a.		____ b.	22.	____ a.		____ b.
	____ b.				____ b.		____ c.
		15.	____ a.				____ d.
8.	____ a.		____ b.				
	____ b.					29.	____ a.
							____ b.

30. ____ a.
____ b.

31. ____ a.
____ b.

32. ____ a.
____ b.
____ c.

33. ____ a.
____ b.

34. ____ a.
____ b.
____ c.

35. ____ a.
____ b.

36. ____ a.
____ b.

37. ____ a.
____ b.
____ c.

38. ____ a.
____ b.

39. ____ a.
____ b.

40. ____ a.
____ b.

Essay Questions (complete 5 of the 9)

1. Lack of Documentation:

2. Conflicting Statements:

3. Ideal Student Records:

4. Caught Red-Handed:

5. Off-the-Record Opinion:

6. Tour too Long:

7. President Argues:

8. New Sales Manual:

9. Running Late:

Return this form to: Susan Reilly, DETC, 1601 18th Street, NW, Washington, D.C. 20009.